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## 2. COMMENT DOCUMENTS

This chapter is a compilation of all the comments that the Department of Energy (DOE) received during the public comment period on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*. Comments received concerning the December 14, 1998, public meeting are also presented in this chapter.

All comments received during the public comment period are presented in this chapter in the order in which they were received and processed. Scanned images of documents received via U.S. mail, fax, e-mail, voice mail, or handed in at public hearings are presented first. These documents are followed by summaries of the comments made at the three public hearings and the public meeting. Numbers were assigned to each document and speaker, and these numbers are keyed to Table 1–5, the Index of Commentors.

The commentors are presented in this chapter in numerical order. Commentor numbers are listed at the top of each scanned image beside the name of the commentor and before the commentor's name in the public hearings/meeting comment summaries in the latter half of this chapter. Commentors who submitted comments during the public comment period are numbered 1-147. Commentors who submitted comments concerning the December 14, 1998, public meeting are numbered 200-255. Commentors who spoke at the public hearings are numbered 500-507 (October 1, 1998, North Augusta, South Carolina); 600-629 (October 6, 1998, Rainsville, Alabama); and 700-720 (October 8, 1998, Evensville, Tennessee). Commentors who spoke at the December 14, 1998, public meeting in Evensville, Tennessee are numbered 800-835.

The comments made by each commentor are identified by number and comment summary-response code in the right margin of each document and under the commentor's name in the public hearings/meeting comment summaries. The first number represents the comment number followed by a slash, and the other numbers represent the comment summary-response code. These codes can be used in Chapter 3 to locate the comment summary and response to each comment. Section 1.3 of this volume further describes the organization of this Comment Response Document and discusses the tables provided in Chapter 1 to assist the reader.

Commentor No. 1: Hank Tiller

## THE SUPERIOR SALES FORCE

*"Where only the best is good enough."*

Allstate Insurance Company

Hank Tiller, Agency Manager

4810B Hixson Pike • Hixson, TN 37343

(423)877-6491

**Allstate**  
You're in good hands.TO: U.S. Department of EnergyFROM: Hank Tiller

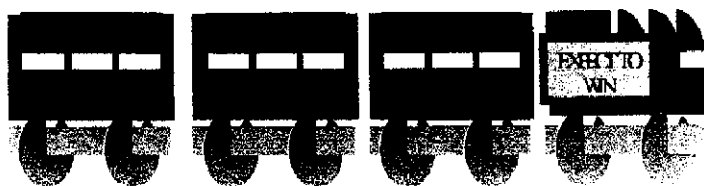
## COMMENTS:

Let's take this project to an accelerator  
in South Carolina. Tennessee doesn't need to  
produce tritium. [Signature]

1/04.01

DATE: 8/20/98NUMBER OF PAGES (Including this cover sheet) 1IF THERE IS ANY DIFFICULTY WITH THIS TRANSMISSION, PLEASE CALL US AT:  
OFFICE PHONE - (423) 877-6491  
FAX NUMBER - (423) 877-7140

THE CHATTANOOGA LINE



HERE COMES THE SUPERIOR SALES FORCE

Commentor No. 2: Leah R. Karpen

## COMMENT FORM

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- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: 1. It goes against national policy to produce materials for weapons at a commercial reactor.2. At a time when the U.S. should be reducing its nuclear stockpile, it is appalling to me that the Department of Energy is even considering manufacturing tritium.3. The money that is being spent, and has already been spent, on this project could better be spent on housing and social needs.4. I am completely opposed to the project at ANY site.5. Why is the Government not listening to the people?

1/01.09

2/02.01

3/23.13

4/01.01

5/05.21

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (Mrs.) Leah R. Karpen [Signature] (optional)Organization: Women's International League for Peace and FreedomAddress: 400 Charlotte Street #803City: Asheville State: NC Zip Code: 28801-1452Work phone: ----- Home phone: 828-254-5489Fax: 828-254-5489E-Mail Address: -----

**Commentor No. 3: R. P. Borsody**

**Commentor No. 4: W. Lee Poe, Jr.**



**COMMENT FORM**

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: IN THE PAST DELIVERY SYSTEMS REQUIRED THE  
LIGHTEST POSSIBLE WARHEADS, ESPECIALLY WITH THE USE OF  
MULTIPLE WARHEAD PLATFORMS.  
CURRENT TREATIES AND THOSE UNDER CONSIDERATION WILL  
LIMIT WARHEADS TO 1 PER MISSILE SO TOTAL THREAT-WEIGHT  
CAN BE CALCULATED BY OTHER NATIONS.  
IN SO MUCH AS OUR LAUNCH SYSTEMS CAN HANDLE THE  
INCREASED WEIGHT, BOOSTING USING TRITIUM IS NO LONGER  
NEEDED. THE REMOVAL OF WARHEADS AS THEY ARE  
DECOMMISSIONED WILL FREE UP A LOT OF LONG-LIVED  
RADIOACTIVES WHOSE USE IS ONLY GOOD IF PUT BACK  
INTO WARHEADS.  
IT IS FOR THESE FACTS THAT I PROTEST THE USE OF  
TRITIUM AND THE SPENDING OF FUNDS TO CREATE  
MORE OF IT. SIZE OF WARHEADS VEHICLES CAN BE  
BEST SOLVED BY USING LONG-LIVED RADIOACTIVES  
INSTEAD OF TRITIUM BOOSTING.

THANK YOU FOR ALLOWING ME TO COMMENT ON THIS  
SUBJECT. I WAS UNFAMILIAR WITH NUCLEAR WEAPONS  
FOR A SHORT WHILE WITH THE USIA AND HERE TO GO  
AND SEE THEM REMOVED FROM A DE STRIKE CAPACITY.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: R. P. Borsody (optional)  
Organization: S.P.A.C.E. P.S. I.  
Address: PO Box 1036  
City: SAEULA State: GA Zip Code: 30019  
Work phone: \_\_\_\_\_ Home phone: 770-277-6802  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

1/01.03

2/23.13

1(cont'd)

Mr. Jay Rose  
Office of Defense Programs  
U. S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D. C. 20585

FAX 1-800-631-0612

Attn: CLWR EIS

Dear Mr. Rose:

Re: Preliminary Information on CLWR EIS in Preparation for Public Meeting

I would like to thank you for scheduling a public meeting on this EIS in North Augusta, S.C.. I look forward to attending the meeting on October 1, 1998. When I received the draft EIS earlier this week, I immediately read it with great interest. I found several areas so far in the D-EIS that I wish you would supply me additional information on before the October 1 meeting. It would make your intended meeting more valuable to me. The areas of information are described below.

- 1) In the Summary volume, you indicated that there was an EIS prepared to evaluate the conversion of Bellefonte to fossil fuel. Please send me a copy of the EIS (title apparently is "Final Environmental Impact Statement for the Bellefonte Conversion Project") and a copy of the ROD associated with this EIS.
- 2) I would also like you to send me information on the lead test assembly program. In particular I would like information on:
  - What was done in the PNNL tests to show that the tritium targets are satisfactory targets and they do not leak tritium during irradiation and the tritium can be quantitatively recovered and a copy of those results.
  - Information on the structural design to keep the TPBARs stable in the reactor. (The figures shown in the CLWR EIS make this target design look as if it is a cantilevered-top-attached target. This makes me conclude it is subjected to damage during irradiation from water flow vibration.)
  - Information on the benefit DOE or TVA have obtained and expects to obtain from the Watts Bar irradiation. (For example, has the Watts Bar effluents increased in tritium releases since the TPBAR irradiation was started?) From the

1/05.22

2/19.02

3/19.03

4/05.10

Commentor No. 4: W. Lee Poe, Jr. (Cont'd)

information contained in Section S.1.6.1.2, irradiation tests started in September 1997 and with an 18 month irradiation cycle should be discharged in March 1999. This discharge is after the scheduled time for the Secretary of Energy decision that I read so much about in the local newspaper that affect the APT and the CLWR EISs and the Tritium Extraction EIS. What I hear quoted is a decision in December 1998.

4 (cont'd)

- 3) DOE has linked the tritium production EISs together. This action is made obvious in that the CLWR EIS has as its no action alternative the APT production and the FEIS on the APT seems to show the No Action to be production in the CLWR. No where have I seen a real no action alternative. (The draft APT EIS had a sort of No Action Alternative but it was removed in the final EIS.) Coupling this to what I read about the Secretaries decision coupling these two EISs and the Tritium Extraction EIS makes the public wonder about NEPA linking. Please provide me information on why this approach has been made by DOE.

5/05.01

6/05.02

5 (cont'd)

- 4) Section S.1.5.4 describes nonproliferation considerations. In my hurried review of the body of the EIS, I was unable to find more information. Please provide me with Congressional or Presidential positions on this subject at the time AEC regulatory authority was given to the NRC and the rest of military support mission was given to ERDA and then DOE. It seemed to me this was the time that the decision to separate commercial power from weapon production was made. Also provide me with information on the decision to produce power in the dual purpose N-Reactor. (It seems quite a different thing to produce electric power in a government reactor that has a primary mission to produce weapon material than producing tritium (a weapon material) in a commercial reactor.) That latter point seems to be DOE's justification in the referenced section. Also please provide me whatever recent nonproliferation studies that relate to this point. Is it logical to initiate use of commercial reactors to produce weapon materials now that DOE doesn't have that capability within the Department?

7/01.08

8/01.09

- 5) I hope that DOE will have tables at the public meetings that compare the impacts of producing tritium in CLWR and the APT. It seems to me that is one of the major comparative assists in the NEPA decision on this EIS and on the APT EIS.

9/04.03

- 6) The one thing that has made the local press lately is the CLWR and APT costs. Seems to be a large argument on the subject. Please provide me some early information that will help me understand the issue. Also please send me both cost analyses on the same basis. If they are not on the same bases, please identify for me the differences and DOE's estimate of how those differences play into the cost judgments.

10/23.15

Sincerely

W. Lee Poe, Jr.

Commentor No. 5: G.J. Billmeier, Jr., M.D.

## COMMENT FORM

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Comments: THE DOE CLAIMED IN 1988 THAT NATIONAL SECURITY WOULD BE COMPROMISED IF TRITIUM PRODUCTION DID NOT REMAIN SIMPLY A LOW-LEVEL CRISIS HAS RESOLVED. THE CURRENT CLAIM BY DOE TO RESUME TRITIUM PRODUCTION AT AS MANY AS 10 REACTOR SITES WOULD LIKELY COST TENS OF BILLIONS OF DOLLARS TO SUPPLY OUR CURRENT ARSENAL OF SOME 23,000 WEAPONS. THE CONGRESSIONAL RECORD OF JUNE 17, 1992 (VOL. 138 NO. 87) STATES IN PART "THE TIME HAS COME WHEN WE ARE SHIPING TREASURES AWAY FROM A ONE-CENTURY OF RELIANCE-DEPENDENCY ON NUCLEAR WEAPONS -- OUR OBJECTIVE SHOULD BE TO CURTAIL NUCLEAR WEAPONS' FUNCTION IN MILITARY DOCTRINE, TO HOLD OPEN RATHER THAN SEAL OFF OPTIONS FOR FURTHER REDUCTIONS IN NUMBERS OF NUCLEAR WEAPONS -- TO SHARPLY CUT BACK ON TESTING TO A LEVEL ABSOLUTELY CONSISTENT WITH AS MUCH AS THE MINIMUM REQUIRED FOR SAFETY & RELIABILITY AND TO PROMPTLY SUSPEND PRODUCTION OF LONG-TERM ASSIGNABLE MATERIALS UNLESS THEY ARE OF AN INTERNATIONAL AGREEMENT." (U.S. SENATE COMMITTEE ON ARMED SERVICES)  
WE NEED TO BAN PRODUCTION OF ALL BOMB MATERIALS INCLUDING TRITIUM ANY CONTINUATION OF SUCH PRODUCTION CARRIES HIGH RISK POTENTIAL FOR BOTH ENVIRONMENTAL & HUMAN NUCLEAR WAR.

1/02.01

2/01.01

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: G.J. BILLMEIER, JR. M.D. (optional)  
 \* Organization: PHYSICIANS FOR SOCIAL RESPONSIBILITY  
 Address: 6024 POPPULAR AVE.  
 City: MEADWIS State: TN Zip Code: 38119  
 Work phone: 901-761-1880 Home phone: \_\_\_\_\_  
 Fax: 901-682-2049  
 E-Mail Address: \_\_\_\_\_

\* AMERICAN ACADEMY OF PEDIATRICS  
 \* INTERNATIONAL PHYSICIANS FOR THE PREVENTION OF NUCLEAR WAR



COMMERCIAL LIGHT WATER REACTOR PROJECT

## Commentor No. 6: Clark Coan

### COMMENT FORM

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

#### Comments:

The No Action Alternative is clearly the preferred alternative for the following reasons:

(1) The probability of new arms control agreements providing for substantial cuts in the number of nuclear weapons deployed is high. The Abolition 2000 movement, which calls for a Nuclear Weapons Convention phasing out nuclear weapons, is gaining momentum, particularly after the testing by India and Pakistan. Furthermore, the near-launch of nuclear weapons in January, 1995 by the Russians is giving impetus to de-alerting the strategic forces (removing warheads from delivery vehicles to prevent accidental launches). Thus, the need for tritium (assuming continued recycling of the gas from decommissioned warheads) will decline rapidly in the next few years negating the need for new production.

(2) The Savannah River Reservation is already severely contaminated with radioactive materials and has to be considered a national sacrifice zone along with Hanford in Washington State. If the National Security Council and the DOE decide to proceed with new tritium production, there is no reason to sacrifice another region of the nation. The human populations and biosphere near Savannah River have already been negatively impacted. There is no valid reason to subject the people and ecosystems of Eastern Tennessee and Northern Alabama to additional exposure to radioactivity.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

**OVER**

Name: MR CLARK COAN (optional)  
Organization: THE SOUTHWIND GROUP  
Address: PO BOX 44-2043  
City: LAWRENCE KS 66044  
Work phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

3) The barrier between civilian commercial nuclear power and production for military needs should not be breached. If it is, civilian reactors become targets for attack by terrorists and foreign powers.

## Commentor No. 7: Nathan Coggins

Nathan & Kathey Coggins Family  
255 Taylor Bridge Rd  
Jonesborough, TN 37659

7/29/98

U.S. DOE  
Commercial Light Water Reactor Project  
Attn: Steven Sohinki  
POB 44539  
Washington, DC 20026-4539

RE: Response to mailing 7/15/98

Gentlemen:

I am sorry I was unaware of the comment period which I could have overlooked. I imagine a response at this time would be to no avail. As a response at anytime from a non influential taxpayer such as our family, is in my opinion to no avail.

For what it is worth, DOE & TVA should not mix power generating with weapons production. Plus how many times will we need to destroy the world. Is not the old technology that used Plutonium and Uranium to destroy Nagasaki and Hiroshima sufficient to destroy our next target? Is the tritium use only job security as it only last a short while?

This stuff is way over my head but I personally detest the waste that goes on at both agencies. When I see my small savings account depleted for taxes. Then hear stories of Westinghouse soaking the govt for 4 billion over 4 yrs to start a reactor at Savannah River and 100 million for a cooling tower that was used for only three months. Plus hiring soviet Nuclear Engineers to keep them from going to work for some other country.

All these efforts to show strength to would be attackers from foreign countries may be a waste of time if the unrest within the U.S. is overlooked. The projected cost of 384m will be exceeded by who knows how much.

We work hard, try to live right and be honest enough to pay for our fair share of being a US citizen and it hurts deeply when we see all the waste and injustices that takes place. I ask you to please become a productive member of our society and stop fleecing the taxpayers. When you are lobbying to spend these millions, billions. Please think of our family who shops at yard sales for clothing for our kids and raises a garden and cans food for winter. Not because we necessarily have to but because it is being a good steward of the money that has

1/02.01

2/04.01

3/01.09

4/22.01

1/01.09

2/01.01

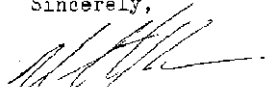
3/23.13

Comment Documents

**Commentor No. 7: Nathan Coggins (Cont'd)**

been entrusted to us by God. How much greater is your responsibility to be frugal with hard working taxpayers money. || 3 (cont'd)

Sincerely,



Nathan Coggins

**Commentor No. 8: Charles F. Evans****COMMENT FORM**

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I would like to see BellSouth complete as a turbine plant. It would help us and the Gov. The light water reactor would supply power that we need. If you get with S.C. it would be all over and no help to them and*

1/07.01

COMMERCIAL LIGHT WATER REACTOR PROJECT

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: *Charles F. Evans* (optional)  
 Organization: *BellSouth Corp. 454 Chattanooga, TN*  
 Address: *385 Gentry St. 231*  
 City: *Hollywood, AL* State: *AL* Zip Code: *35752*  
 Work phone: *423-256-6000* Home phone: *256-437-2403*  
 Fax: \_\_\_\_\_  
 E-Mail Address: *CHUCK.FU@BELL SOUTH.NET*

**Commentor No. 9: Leah R. Karpen**

**Leah R. Karpen**

100 Charlotte St #603  
Asheville NC  
28801

Phone: 828-254-5489  
FAX: 828-254-5489  
email:

Wednesday, August 12, 1998

Mr. Stephen M. Schinki, Director  
Office of Commercial Light Water  
Reactor Production  
P.O. Box 44539  
Washington, DC 20026-4539

Der Mr. Schinki:

**Production of Tritium**

When I received your letter of July 15, 1998, I was appalled to learn that plans are proceeding for producing tritium. Further, to produce it in commercial light water reactors goes against national policy, which separates military production from commercial.

There has been no established need for tritium. The United States should be reducing its nuclear stockpiles rather than adding to or replenishing them.

Therefore, I oppose the project in totality.

Sincerely yours,

*Leah R. Karpen*  
Leah R. Karpen

P.S. Please send me notice of meetings on the draft EIS.

**Commentor No. 10: Rick Paschal**



**COMMENT FORM**

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- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I would first like to emphasize that I no longer do any pipe work and have been in automotive painting business for the past few years. Also I live only 5 miles (as the crow flies) from the Bellegarde plant. I just want you to understand that if steel will probably not return to the construction trade of pipe fitting which keeps me from being totally trained. I'm still partially trained because of the known support because I do live in this area.*

*After reading the summary of the Draft Environmental Impact Statement I would say to me that Bellegarde 1 & 2 are the (ONLY) logical places to produce the tritium. I agree the only impact on the environment and the second impact that is good but the most favorable thing I read is how Bellegarde 1 & 2 can be phased in the construction stages to facilitate the needs of a tritium producing plant which would make Bellegarde 1 & 2 the (ONLY) logical choice to make.*

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: RICK PASCHAL (optional)  
Organization: L.H.# 493  
Address: 363 G Rd 59  
City: Witten State: Ar Zip Code: 35744  
Work phone: 256-657-2143 Home phone: 256-657-2143  
Fax: 256-657-5593  
E-Mail Address: R.PASCHAL@attglobal.net

7/4/98

1/07.03

**Commentor No. 11: Sharon & Gerry Thomas, Jr.****COMMENT FORM**

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *My husband or myself is not for using Bellefonte for production of tritium. I had rather it be used for a natural gas facility. I don't want this in my back yard. It seems its come in our drinking water. Natural gas facility is what we need.*

1/07.06

2/14.04

1(cont'd)

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: *Sharon & Gerry L. Thomas, Jr.* (optional)  
 Organization: \_\_\_\_\_  
 Address: *4488 Co. Rd. 81*  
 City: *West Rock* State: *AL* Zip Code: *35566*  
 Work phone: \_\_\_\_\_ Home phone: *(256) 632-2231*  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

**Commentor No. 12: Joyce Coffey****Comments Received via "800" Number**

Date:	Aug 31, 1998 (7:08pm)
Name:	Joyce Coffey
Organization:	
Address:	624 "Chalsey" Road 141 Hollywood, AL 35752
Phone #:	(256) 437-8027
Fax #:	
Comment #:	

**Comment:**

I'm calling to make a statement against tritium at Bellefonte. I am a school teacher that teaches on the mountain above Hollywood and I live near Hollywood. Any, any, any chance of radioactivity being loose in the area is unacceptable--our jobs are not needed that badly. If we need jobs and need to use the plant which has sat idle for a number of years, the natural gas project would be the only acceptable way to go for the residents of this area. We were told when a paper-mill moved into the area that we would have no smog and no odor; however, in our beautiful valley, when there's fog, we have odor. We certainly do not need another plume to desecrate this beautiful valley. Thank you.

1/07.03

2/14.04

3/07.06

4/10.01



**Commentor No. 13: Suzanne Marshall**

September 15, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attn: Mr. Stephen Sohinki  
P.O. Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinki,

I write in opposition to production of tritium in any TVA commercial light water reactor in the U.S. Your Draft Environmental Impact Statement on the Production of Tritium in a Commercial Light Water Reactor does not protect completely the health of the public or the environment from the effects of tritium, a radioactive form of water that can flow through the food chain, emit radiation into ecosystems, plants, animals and humans. It can then cause cancers, genetic mutations and problems in unborn babies. *There is no safe dose.* The only way to avoid the lethal effects of tritium and other nuclear wastes is to halt all production of these substances and their waste. AND since all of the DOE's former tritium production plants have had accidents resulting in leaks into the environment, there is no doubt that commercial reactors inherently unsuited for weapons production will leak and destroy the Tennessee River, the Tennessee Valley and our lives.

Tritium production is not needed. Tritium from old warheads can be recycled which will serve to maintain our arsenal until 2015. With continued arms negotiations, even less tritium will be needed in the future. Certainly, commercial reactors were not designed for any phase of weapons production. Producing tritium at commercial plants like at Bellefonte, AL or Watts Barr, TN would lead to increased safety and security issues that cannot be adequately addressed.

I implore you to halt plans for tritium production in any TVA or any commercial reactor. It is not safe and it will violate the Atomic Energy Act, the intent of which was to keep commercial and nuclear power separate for reasons of non-proliferation, safety and security.

Sincerely,



Suzanne Marshall  
700 8th Avenue NE  
Jacksonville, AL 36265

256-782-0424

**Commentor No. 14: Peter Gray**

Peter L. Gray  
P. O. Box 968  
Aiken, SC 29801

October 16, 1998

**"Production of Tritium in a Commercial Light Water Reactor"**  
draft DOE/EIS - 0288D

There are three reasons for not using a Commercial Light Water Reactor to make tritium.

**Non-proliferation** is the first reason. We should set an example for the world not to make weapons in civilian facilities. It is U.S. policy that separation of civil and military facilities be maintained.

We accept the concept of peace coming from war, but not the reverse. Using facilities originally developed for military missions later on for civilian purposes is acceptable. In this EIS, DOE cites four examples of this:

- "N-Reactor at Hanford" started life as a military facility to make plutonium and later make electricity. This is not comparable to converting a civilian LWR to make tritium.
- "The dual use nature of the U.S. enrichment program" It made U-235 for bombs. Later, it supplied civilian LWRs and research reactors.
- "The use of defense program plutonium production reactors to produce radio-isotopes for civilian purposes" Radio-isotopes are a boon to civilian life in the U.S.
- "The sale of tritium produced in defense reactors in the U.S. commercial market" Self-powered exit lights on aircraft to guide passengers in an emergency and other civilian uses come from these sales.

All of these go in the "military-to-civilian" direction. Notice that DOE does not cite any example of going in the "civilian-to-military" direction.

All DOE does on the non-proliferation is use rather legalistic, hairsplitting language to say it's okay.

The bible says in Isaiah 2-4: "they shall beat their swords into plowshares."

Can you imagine telling North Korea to end their nuclear weapons program, giving them two CLWRs if they do so and then we make tritium in a U.S. CLWR? What about setting examples for Pakistan, India and other countries? We need to espouse actions on a high moral, ethical plane. We must not use legalistic loopholes to attempt to justify what we and DOE both know is wrong.

DOE must not use any U.S. Commercial Light Water Reactor for future tritium production, whether owned by a private company or by the TVA, whose whole history is one of civilian projects. Sure, the TVA sold electricity to the Oak Ridge Gaseous Diffusion Plant, but other vendors sold pipe, concrete, motors, instruments, etc. Doing so does not turn them into military facilities. The ownership of TVA by the U.S. government does not justify calling a TVA reactor a military installation, nor does the question of who bought its electricity.

**Licensing Delays** is the second reason. When the AEC was split up in the 1970s, production went to DOE. NRC got licensing and oversight of civilian facilities. One facet of the split was to not hamstring our military complex with licensing issues and delays. The civilian nuclear electric industry is rife with NRC delays. What makes the DOE think that the NRC will not delay any DOE defense programs assigned to a CLWR?

Notice that these first two reasons for not using a CLWR apply only to a CLWR but not to the accelerator. It is not encumbered with either non-proliferation issues or licensing problems.

1/14.04

2/15.03

3/02.01

4/22.01

2(cont'd)

5/01.09

1/01.09

2/21.05

**Commentor No. 14: Peter L. Gray (Cont'd)**

**The third reason** to reject the CLWR, and DOE's other option, the accelerator, is discussed immediately below. It applies equally to both of these options.

**Cost** is the third reason. The CLWR might cost about \$2 billion or more and the accelerator about \$2.5 to 4.5 billion. If cost is to be the real discriminator, the DOE owns another, considerably less expensive tritium production concept. One that will cost about \$600 million. Or less than 1/3 of either of the DOE's current choices.

DOE recently stated:

"The department is committed to doing a comprehensive, unbiased analysis of the various options for tritium production. Then Acting Secretary Moler insisted that the decision be made on its merits (underlines are mine)."

DOE is studying the CLWR and accelerator, but they own a third option and are ignoring it. It was invented in January 1992 but was covered up by the SRS prime contractor. It never received a review of its merits:

1. **Safety** The unit is passively safe. It eliminates or reduces significantly all Design Basis and Severe Accidents.
2. **Small** It would require about 20 acres compared to 500 for the accelerator.
3. **Proven** All parts of the design have been proven through many years of use in the nuclear field.
4. **Environmentally Friendly** It would use about 15 MW of electric input, not 600 with the accelerator, thus generating considerably fewer greenhouse gases.
5. **Lowest Cost** Four comparable designs have been costed. Extrapolation indicates about \$600 million for this unit.
6. **Radiopharmaceutical Production** This unit can make all the radioisotopes the U.S. desires and now buys from Canada because we've never had that capacity within our borders.

Following an EIS-0161 meeting in April 1995, DOE committed in its EIS answers in October 1995 to consider this design. But they have not done so. In conversations with senior persons, I've learned that most do not even know of its existence. I've requested objective, technically-based, independent, non-biased reviews of it. The requests have been denied.

As a taxpayer, I object. I challenge the DOE to follow through on its 1995 commitment to this unit. It deserves a full review. It should be used for new tritium production in the U.S. Its cost is the lowest.

**Final Non-Proliferation Comment** Special Nuclear Material (SNM) includes highly-enriched uranium and plutonium but not tritium. Tritium is called "by-product" material. DOE rests part of its case on the basis of this definition to say using a CLWR is not contrary to non-proliferation policy. This is a very specious argument. All nuclear weapons in the U.S. arsenal need a fissile component (either uranium or plutonium). They also need a fusion component, tritium; that is why DOE is planning to make more. Semantic definitions cut no ice. Sure, tritium is not fissile, but it does undergo fusion. What, really, is the difference? Call tritium SNM. Stop playing word games.

**Conclusion** Non-proliferation issues, possible licensing delays and cost dictate against a CLWR. Low cost also dictates against the accelerator. Low cost certainly favors SRS and the 1992 design.

So, is it 2 billion for TVA, 2.5 billion for an accelerator or 600 million for this DOE-owned idea?

Use the SRS with nearly 45 years of tritium experience where we are ready to serve the nation again: capably, safely, efficiently, cost-effectively and in an environmentally sound manner.

Sincerely,

Peter Gray

3/04.02

1(cont'd)

3(cont'd)

**Commentor No. 15: Betty Hasty**

and Editor

259-1020 Ext. 25

Sunday, August 30, 1998

The Daily Sentinel - Scottsboro Newspaper

**COMMENT FORM**

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- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I believe the completion of BLN for anything other than Nuclear Power will be a gross waste of billions of taxpayer dollars. I prefer to leave tritium away from BLN but could accept it if needed. Dr. John Robinson, a former man and a good representative of Jackson Co. in all other respects but, I believe his wife's family history of personal animosity toward TVA/BLN, negates him as the district representative for or against TVA/Beaufort Nuclear Plant.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Betty S. Hasty (optional)  
 Organization: Ret. TVA/BLN Employee  
 Address: 1608 E. Ridge  
 City: Scottsboro State: AL Zip Code: 35768  
 Work phone: N/A Home phone: 256-574-1041  
 Fax: N/A  
 E-Mail Address: Cee JOHN FRANK HURT etc. (John Robinson)

1/07.03

Commentor No. 16: Cameron G. Sherer



**COMMENT FORM**

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Comments: *The Tritium Accelerator has several advantages over the production of Tritium in a Commercial Light Water Reactor. Having these advantages are no nuclear waste, no spent fuel rods, no a time and protect, safe power, provide energy for medical purposes, politically acceptable.*

*Please consider the Accelerator option on the CLEP. I oppose to the DOE in allowing public comment on this issue.*

1/04.01

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Cameron G. Sherer (optional)  
 Organization: Westinghouse Savannah River Co.  
 Address: 4634 Hardy Williams Rd.  
 City: Evans State: Ga. Zip Code: 30809  
 Work phone: (404) 952-4954 Home phone: (404) 963-4487  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

Commentor No. 17: Anonymous



**COMMENT FORM**

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I think the best thing to do w/ the Bellefonte is to tear it down and spend no more money on that project. I personally don't want the production of tritium on that property. Believe me, the eyes that want it is just for the money that contractors pay them under the table. I'm probably with your knowledge. My anger is no. I don't want my drinking water polluted with that kind of plant. You wanted input and I'm giving it. I will not give my name, but I do live in the city limits of Scottsboro, AL.*

1/07.03

2/14.04

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: \_\_\_\_\_ (optional)  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: Scottsboro State: AL Zip Code: 35769  
 Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

Mail to:  
 U.S. Department of Energy, Commercial Light Water Reactor Project Office,  
 ATTN: Stephen Sobinski  
 P.O. Box 44539,  
 Washington, D.C., 20026-4539

**Commentor No. 18: Elizabeth R. Brown****COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:** I don't want DOE to build an Accelerator at SLAC. It is a waste of money to transport TPAAs across the country. CLWR sites do not exist for the purpose of transporting waste, they are for the purpose of producing tritium. It is inappropriate to have these facilities for disposal at the SLAC or the Savannah "dump" sites.

Since the "clean-up" work (to remove environmental hazards and stabilize nuclear materials) at the Savannah River Site facility, doesn't seem to be accomplishing its goal, and it costs over \$4 billion, and takes 40 years to complete, our state doesn't need any more nuclear/radioactive waste to be stored there.

Up a bay area concerned with environmental factors, the health and safety of the population along the transport routes, but particularly its proximity to the vicinity of the Savannah River plant site, and the forest future generations, but also mention that finally I don't want South Carolina to become DOE's or industry's "dump" or storage facility for nuclear and radioactive waste. The cleanup work would never be completed. (Thank you)

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Elizabeth R. Brown, Dist. Legis. Representative (optional)  
 Organization: SLCCL, Charleston County  
 Address: 12 Pearson Ave.  
 City: Charleston State: SC Zip Code: 29407  
 Work phone: \_\_\_\_\_ Home phone: 843-6544  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

9/7/98

7/4/98

**Commentor No. 19: R. C. Dawson****COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:** Rather than continuing the production of an expensive and probably illegal substance of weapons of mass destruction, stop making tritium altogether, but do weapons before it's too late.

THAT WOULD HAVE A POSITIVE IMPACT ON THE ENVIRONMENT.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: R. C. Dawson (optional)  
 Organization: 1814 Korte St.  
 Address: Los Angeles CA 90028-1832  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

**Commentor No. 20: Joan O. King**



**COMMENT FORM**

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Comments: \_\_\_\_\_

I have followed nuclear issues for a number of years and have a fairly extensive layman's knowledge of what is involved. I am very concerned at any move on the part of our government that violate lines set up by President Eisenhower at the end of World War II separating commercial and military nuclear programs. I am not convinced there is any pressing need for tritium. Future military needs can be handled within the military establishment.

1/01.09

2/02.01

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Joan O King (optional)  
 Organization: LWW - OTHERS  
 Address: 304 Manor Drive  
 City: Santee State: GA Zip Code: 30527  
 Work phone: 706-878-3459 Home phone: same  
 Fax: same  
 E-Mail Address: joank @ stc-net

7/4/98

**Commentor No. 21: Mrs. W. H. Robinson**



**COMMENT FORM**

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Comments: \_\_\_\_\_

*NO to Tritium*

*No to tritium*

1/02.01

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Mrs W H Robinson (optional)  
 Organization: Personal  
 Address: 1756 Skyline Dr  
 City: Decatur, AL State: AL Zip Code: 35708  
 Work phone: \_\_\_\_\_ Home phone: 259-5342  
 Fax: \_\_\_\_\_ Robinson  
 E-Mail Address: Skyline Shores Drive  
Scottdale, AL 35769

**Commentor No. 22: C. S. Sanford****COMMENT FORM**

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Comments: p. 25, par. 2 states that Watts Bar 1 radiation exposure within 50 miles is 0.55 person-rem/yr. How was this value derived?

1/14.07

p. 5-33, Watts Bar 1 - radioactive effluent is given as 14,850 curies per year. Is the surface water impacted by this effluent and, if yes, then why is not there a change to water quality conditions?

2/11.08

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: C. S. Sanford (optional)  
 Organization: SEA  
 Address: 1803 Primrose Ave  
 City: Nashville State: TN Zip Code: 37212  
 Work phone: \_\_\_\_\_ Home phone: 615-383-9828  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

**Commentor No. 23: Bob Schowalter****COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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Comments: I have reviewed the draft EIS and know a little bit about the proposal for TVA to use Bellefonte NP to produce tritium for DOE.

It seems to me that it is the logical way to go. Bellefonte is a govt facility with billions of dollars already invested. As I understand it, it will cost DOE less to help pay for completing Bellefonte than the other alternative. Plus DOE will get a share of the power revenues. From an economic standpoint it seems to be an obvious choice.

1/07.03

I know there are other considerations. The fuel rods would have to be transported to S.C. to remove the tritium, as I understand it, and this would involve some risk. I think they would have to be transported somewhere anyway for disposal, so I don't know how much additional risk is involved. I understand there are political considerations involving the use of a commercial reactor for making the tritium. So what! TVA is a creature of the federal govt. They have provided power for military purposes and to support atomic energy programs for more than 50 years.

2/18.01

3/07.02

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Bob Schowalter (optional)  
 Organization: TVA  
 Address: 11608 Midhurst Dr.  
 City: Knoxville State: TN Zip Code: 37922  
 Work phone: (423) 673-2267 Home phone: (423) 966-6016  
 Fax: 2216 (work)  
 E-Mail Address: \_\_\_\_\_

P.S. I was an HVAC design engineer on Bellefonte many years ago, and I think it's a shame to not use a valuable asset like Bellefonte.

**Commentor No. 24: Denny R. Stiefel**



**COMMENT FORM**

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Comments: I attended the meeting, please  
Bellevue is pre-authorized at the time.  
I am not sure if it is a good idea.  
The Bellevue nuclear plant is a complete  
The people here want the plant here.  
We have the qualified people to complete  
the plant & we need the jobs

1/07.03

Sincerely,  
Denny R. Stiefel

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Denny R. Stiefel (optional)  
Organization: Definitely Single 1769 Locust Avenue #48  
Address: 1475 Locust Rd 533  
City: LYNN, MA State: MA Zip Code: 01901  
Work phone: 256-546-6791 Home phone: 256-623-6164  
Fax:  
E-Mail Address:

7/4/98

**Commentor No. 25: Rhonda D. Wright, M.D.**

**Rhonda D. Wright, M. D.**

3363 Narrow Lane Road  
Montgomery, AL 36111-1507

Phone (334) 286-4894  
e-mail [rdwright@aol.com](mailto:rdwright@aol.com)

September 06, 1998

Mr. Stephen Sohinki  
U. S. Department of Energy  
Commercial Light Water Reactor Project Office  
P. O. Box 44539  
Washington, D. C. 20026-4539

Dear Mr. Sohinki:

This letter is in opposition to the proposal to use the TVA's unfinished Bellefonte plant, or any other commercial nuclear reactor, for the production of tritium. I regard this as a dangerous and highly undesirable course of action for several reasons.

The first is the ability of tritium as an isotope of hydrogen to combine with oxygen and make a radioactive form of water, which can then become incorporated into all parts of the human body including DNA. In concert with the DOE's demonstrated inability to prevent tritium-releasing accidents at its other production facilities, there is a near-certainty that tritium production at the Bellefonte plant would result in radioactive contamination of the Tennessee River and in a seriously increased risk of cancer and birth defects to those whose drinking water is derived from this river. Such accidents are all the more likely to occur at a facility which was not designed for this purpose from the beginning.

1/15.02

The second reason is that production of tritium at a commercial nuclear plant will result in the production of much more nuclear waste -- three times more high-level waste than the plant would produce under normal operating conditions, by the DOE's own estimate, and at least 50% more low-level waste as well. Disposal of nuclear waste is already a serious problem, one which this proposal can only exacerbate.

2/17.02

3/16.05

The third reason is that production of tritium in a commercial facility violates the spirit, if not the letter, of the Atomic Energy Act and sets a bad precedent with regard to entanglement of civilian and military nuclear facilities. This action will make meaningless the opposition of the U.S. to the use of civilian plants for weapons production by such countries as Iraq, North Korea, India, and Egypt.

4/01.09

Sincerely,

*Rhonda D. Wright, M.D.*

Rhonda D. Wright, M.D.

Commentor No. 26: Nate Schwenk**COMMENT FORM**

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*Comments: I understand that TVA has withdrawn with Bar and Sequoyah as suggested sites, leaving only Beheforton.*

1/06.03

*I believe this is the best option. I currently live just over 2 miles from Watts Bar, and feel quite safe and confident that the plant is being operated safely.*

2/09.01

*I hope the professional reviewers and anti-nukes are stopped. I hope the proposal could be satisfactory to them.*

3/07.03

*This would be a great event for north Alabama and TN - WIN-WIN. Savannah River will still have the extraction facility - and clean up from other projects.*

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Nate Schwenk (optional)  
 Organization: \_\_\_\_\_  
 Address: 8201 Old Stage Rd  
 City: Spring City State: TN Zip Code: 37381  
 Work phone: 423 365 8198 Home phone: 423 365 2612  
 Fax: \_\_\_\_\_  
 E-Mail Address: schwenk@tvalabama.net nschwenk@tva.gov

7/4/98

Commentor No. 27: Jeffrey Belcher**COMMENT FORM**

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*Comments: Thank you for the opportunity to provide comments on this document. The effects on highway facilities from transportation of the Hazardous Material was adequately addressed. As a suggestion the document should include how a possible spill during transportation would be dealt with and also what would be the impacts to public health if a spill did occur on our highways.*

1/18.09

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: \_\_\_\_\_ (optional)  
 Organization: Federal Highway Administration (FHWA)  
 Address: 249 Cumberland Bend Dr.  
 City: Nashville State: TN Zip Code: 37228  
 Work phone: (615) 736-7539 Home phone: \_\_\_\_\_  
 Fax: (615) 736-5467  
 E-Mail Address: jeffrey.belcher@fhwa.dot.gov

7/4/98





## COMMENT FORM

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- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *Having attended the public meetings at Reinhardt + Rhea county high school + listening to every comment I fully support the production of Tritium in a Commercial light water reactor.*

1/07.02

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: \_\_\_\_\_ (optional)  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

Commentor No. 29: John Tucker

## Comments Received via "800" Number

Date:	9/23/98 (7:19pm)
Name:	John Tucker
Organization:	Athens Limestone Medical Associates in North Alabama
Address:	No address given
Phone #:	No phone/fax number given
Fax #:	
Comment #:	

## Comment:

I am totally against your plan to start a tritium reactor at Bellefonte near Scottsboro, AL. I think you are going to poison the entire environment. I think you need to take your little project elsewhere.

1/10.03

Thank you.

**Commentor No. 30: Jim Sexton****Comments Received via "800" Number**

<b>Date:</b>	9/23/98 (7:41pm)
<b>Name:</b>	Jim Sexton
<b>Organization:</b>	
<b>Address:</b>	11011 Kain Road 47 Florence, AL 35634
<b>Phone #:</b>	256-757-5658
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am calling to make a comment on the idea of making this tritium at the Bellefonte site. I am totally against it for many reasons, one of which is the safety of people around the area and also because I do not believe in making weapons of war. I think tritium there would be a big mistake.

1/14.04

2/01.01

**Commentor No. 31: Kenneth W. Crase**

**First Name** Kenneth **MI** W **Last Name** Crase **Title** Technical Advisor, Health Physics Technology  
**Organization** Westinghouse Savannah River Company  
**Address** Bldg. 707-48B  
Savannah River Site

**City** Aiken **State or Province** SC **Postal Code** 29808- **Country** **Email Address** kenneth.crase@  
**Home Phone** **Work Phone** 803-952-7892 **Work Extension** **Fax Number**

**Date Updated**

8/27/98 12:03:30 PM

**Notes**

I do not disagree with the assessments of impacts contained within the Draft EIS for the Production of Tritium in a Commercial Light Water Reactor, including those for radiation exposures to workers and the public. However, I do believe there is at least one area where costs may not have been folded in to your assessment: The commercial reactor industry does not already possess the infrastructure and experience in dealing with the magnitude of tritium contamination and exposures. To achieve the low radiation exposure impact you have indicated in the draft EIS, additional resources and experience would have to be obtained to adequately handle the changes in the worker and environmental radiation protection programs. There may be other similar ancillary areas of cost impact not dealt with in the draft EIS. I recommend you fold these support costs into your evaluation of commercial reactor generation of tritium versus other means of production.

1/14.08

**Commentor No. 32: Alexis Zigler**

**First Name**  
Alexis

**MI**

**Last Name**  
Zigler

**Title**

**Organization**

**Address**  
3608 Clark Drive

**City**  
Sarasota

**State or Province**  
FL

**Postal Code**  
34234-

**Country**  
USA

**Email Address**  
lexus51@juno.co

**Home Phone**  
941-361-8570

**Work Phone**

**Work Extension**

**Fax Number**

**Date Updated**  
8/25/99 11:13:21 AM

**Notes**  
The light water project is a violation of the Atomic Energy Act. It is not legal to be producing weapons grade material in commercial nuclear facilities.  
The United States cannot credibly preach nuclear non-proliferation to nations such as India and Pakistan while continuing to develop our own nuclear stockpile. Our actions in this regard only increase the likelihood that nuclear weapons will be used in the future, whether by terrorists or by governments.  
The light water program also represents an increased likelihood of environmental contamination. We need to be moving as quickly as possible to non-polluting energy sources, not further developing nuclear energy. The light water program is going to produce materials that will find their way into the food chain and cause harmful effects there.  
I am strongly opposed to the program.  
Thank you, Alexis Zigler

1/01.09

2/01.04

3/07.05

**Commentor No. 33: Mary Stanfill**

**Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (8:31am)
<b>Name:</b>	Mary Stanfill
<b>Organization:</b>	
<b>Address:</b>	2422 Tuxedo Drive Huntsville, AL 35810
<b>Phone #:</b>	
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

My concern is that Bellefonte should not be used for anything to do with producing anything for warfare and that the tritium could cause cancer, cause the environment to be polluted and I want to encourage people to know that to live by the sword, they must die by the sword.

1/07.03

2/14.04

**Commentor No. 34: Robert Sparks****Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (8:59am)
<b>Name:</b>	Robert Sparks
<b>Organization:</b>	
<b>Address:</b>	59 Prentice Circle, NE Arab, AL 35016
<b>Phone #:</b>	
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I'm calling in relation to the tritium project going on in Scottsboro which is about 25 miles from me and I just wanted to give my comment on it and I am not in favor of it proceeding. Thank you.

1/07.03

**Commentor No. 35: Jackie Ambrose****Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (9:02am)
<b>Name:</b>	Jackie Ambrose
<b>Organization:</b>	
<b>Address:</b>	Huntsville, AL
<b>Phone #:</b>	No phone/fax number given
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

This is to do with the thing on television about opening the Bellefonte plant for tritium gas plant radium or whatever - This is to protest it. I'm totally against it. We have enough to deal with, with the other things we had in this area for years. Thank you.

1/07.03

**Commentor No. 36: W. D. Scarbrough**

**Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (11:09am)
<b>Name:</b>	W.D. Scarbrough
<b>Organization:</b>	
<b>Address:</b>	3503 Sparkman Drive, NW Huntsville, AL 35810
<b>Phone #:</b>	256-852-9350
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

Would like information concerning your program on tritium production. I'm not necessarily opposed, but the Department of Energy and other agencies do not have a good record in protecting the environment - Savannah River is just but one example. || 1/08.02

**Commentor No. 37: James William Cod**

**Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (11:29am)
<b>Name:</b>	James William Cod
<b>Organization:</b>	
<b>Address:</b>	1203 Fern Street Athens, AL 35613
<b>Phone #:</b>	
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I was told or at least I read off the television that this was the number to call about the tritium plant proposed by TVA for Bellefonte in Jackson County up near Scottsboro, so that's what I'm really calling about. I'm calling to say that I would not like to see this program put into affect on the Tennessee River because I'm afraid of the long-term--- short-term it's gonna give employment up there but long-term, I'm afraid of the after affects so really that's what I'm calling about. || 1/10.03

**Commentor No. 38: Steve Abraham****Comments Received via "800" Number**

<b>Date:</b>	9/24/98 (11:55am)
<b>Name:</b>	Steve Abraham
<b>Organization:</b>	
<b>Address:</b>	1115 County Road 358 Distah, AL 35765
<b>Phone #:</b>	
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

Yes, I just wanted to reply to the Bellefonte where they want to make tritium and I am kinda against it because we haven't found out enough information about the tritium to satisfy my curiosity. If you have any information on that, I would appreciate some of it. Thank you.

1/07.03

**Commentor No. 39: Diane McFarland****Comments Received via "800" Number**

<b>Date:</b>	9/25/98 (3:00)
<b>Name:</b>	Diane McFarland
<b>Organization:</b>	
<b>Address:</b>	709 Love Branch Road Harvest, AL 35749
<b>Phone #:</b>	No phone/fax number given
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am very concerned about the Bellefonte Plant being reactivated. I just don't think it is a smart idea. I think these things have too long a life span and I read about the cancer rates up and...I work for Corps of Engineers and we do the environmental clean-ups and our Project Managers are in charge of chemical demilitarization that's going on in Johnston Atoll and Umatilla and now Anniston. I just think we should learn a lesson - don't make more of this stuff. Anniston's having a problem with it seeping through the walls. I don't mean to be an alarmist, I just think there should be another way without making these things that have such a long life span. Our children, we want clean water, clean air. I just don't think we can keep making this stuff - can't there be another way? I'd like to be informed or if I can help enlighten others about the dangers. I don't know anything other than it's got a long life span and it's not gonna go away when we create these things. We can find other jobs for people - please. Thank you for listening and I'm just a little citizen. I appreciate anything you can do. Thank you very much.

1/14.04

**Commentor No. 40: James R. Finley**

Address ID Number 29

Salutation   
First Name   
Middle Initial   
Last Name   
Title   
Organization   
Address   
City   
State or Province   
Postal Code   
Country   
EmailAddress   
Home Phone   
Work Phone   
Work Extension   
Fax Number   
Date Updated

Comment

1/23.13

**Commentor No. 41: Robert W. Van Wyck**

**Radiological Consultant**

Robert W. Van Wyck, Certified Health (Physicist)  
708 Helmsdale Place, North  
Brentwood, TN 37027

Tel. 615-373-9176

Sept. 20, 1998

Stephen M. Sohinki, Director  
CLWR Project Office  
US Dept. of Energy  
PO Box 44539  
Washington DC 20026-4539

**Comments On The Draft Environmental Impact Statement For The Production Of Tritium In A Commercial Light Water Reactor**

Dear Mr. Sohinki:

Thank you for the opportunity to express my comments on the above Draft EIS in a timely manner. I previously sent comments to you in a letter but they were too late to be incorporated in the Draft EIS. For your information, none have been adequately addressed and should be in the final EIS.

These specific comments are:

1. The global impact from the further proliferation of atomic weapons throughout the world has not been adequately and honestly addressed and should be.

Since the beginning of the atomic era, our Country has maintained a steadfast policy that peaceful uses of nuclear technology will not be used for manufacture of atomic weapons. Utilization of a CLWR for tritium production is in direct conflict with this policy. If this long standing policy is changed, it will open the door for anyone to manufacture atomic weapons materials from commercial reactors leading to a major increase in atomic weaponry throughout the world. The potential for this to occur, and any resultant impact, should be a first consideration for evaluation in the EIS.

1/01.09

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**Comments to Sohinki, Page 2

The EIS attempts to address this issue in S.1.5.4 but evades the concerns. Item 1 in this section says use of a CLWR for tritium production is not prohibited by law or international treaty. While this may be true, it would still be in direct contradiction of our long standing policy, practice and stated intention. For example, how can our country encourage North Korea to utilize one of our nuclear reactors to produce electricity, as we have done, and not expect them to follow our proposed example and use it also for weapons production?

Item 2 reports the historical use of defense materials and technology for peaceful uses. Historically, it has been standard practice to utilize technology developed from defense research for peaceful uses. However, it is clear that none of these "examples" involve the opposite, as is now proposed, to use peaceful uses for weapons production. This proposal will be a "first" to my knowledge.

Item 3 attempts to argue that maintaining separation between US civil and military activities could be adequately addressed, given particular circumstance involved, but none is given. Further, a weak argument is given that the TVA is owned by the US Government and therefore production in a TVA facility makes it "roughly" comparable to past instances of government owned dual-purpose nuclear facilities. Nothing could be further from the truth. The DOE makes atomic weapons, paid for by tax payers. The TVA makes electricity for distribution throughout the southeast region it serves and is paid for by ratepayers.

2. The EIS has not addressed the enhanced security provisions that will be required and the significantly increased potential danger to populations surrounding the site if a CLWR is used for weapons manufacture. Emergency preparedness is addressed for each of the proposed TVA sites but only from the perspective of a plant accident and fails to address the primary increased risk if the site is used for weapons manufacture. Our enemies in the past have had weapons sites pre-targeted for nuclear bombing in the event of war and it is reasonable to assume that the sites are still pre-targeted or can be re-targeted with little difficulty. At a minimum, the EIS should include an evaluation of the impact on surrounding populations in the event of a direct or near direct blast of an external atomic weapon used to destroy the facility.

1(cont'd)

2/22.01

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**Comments to Sohinki, Page 3

3. A new safety analysis will have to be performed to consider the potential increased internal pressure in the reactor vessel during a melt-down that could result from partial fusion of the large quantities of tritium in a degraded core with uncontrolled re-criticality. TMI temperature data should be used in the analysis. Although "Beyond Design Basis Accidents" were analyzed, the analysis was done using the MACCS2 accident analysis computer code for a standard PWR core. However, if a significant increase of energy can be released in the reactor vessel due to fusion of tritium gas in the core during a meltdown accompanied with uncontrolled re-criticality, the code would not be useful for assessment of accident conditions.

3/15.04

**Issue of Concern Discussed But Not Evaluated In The EIS**

1. There is serious concern regarding the ability of the DOE and the TVA to carry out this project successfully. The EIS needs to point out changes in these organizations that have or will be taking place to give assurance that the project will be handled properly and in accordance with this EIS.

The stated purpose of the EIS is to analyze the potential consequences to the environment associated with the project. I submit that part of the analysis should be an evaluation of the specified candidates capabilities to successfully carry out the project.

**DOE**

The DOE, for one reason or another, has largely failed to accomplish any meaningful nuclear progress in recent years. As stated in S.1.5.2, over a dozen reactors for the production of nuclear materials at its many sites have been shut down and are no longer available despite the outlay of billions of dollars. Also as stated, the SRP K Reactor was discontinued in 1988 for major environmental, safety and health upgrades. Since the SRP site has already been contaminated beyond any reasonable or economical expectation for clean-up, it is difficult to see where a major environmental upgrade would be needed for continued tritium production. More than 10 years have lapsed since the DOE lost its capability to produce tritium and is unable to do so except for this proposed scheme. Likewise, the DOE has been unable to develop a Long Term Nuclear Disposal Site in Nevada even though it is

4/08.02



**Commentor No. 41: Robert W. Van Wyck (Cont'd)**

Comments to Sohinki, Page 4

located adjacent to the site where hundreds of nuclear weapons have already been exploded underground (already making the area a long term nuclear waste storage site) and millions of dollars have been spent on "environmental studies". Frankly, the capability of the DOE, under its present leadership, staffing limitations, nuclear knowledge and past experience, raises serious doubts as to its current capability to carry out the project in an environmentally acceptable manner. With all the problems now being faced by the DOE in the non-nuclear energy area, it is not surprising that nuclear and defense matters are not paramount. Perhaps the time has come for Congress to reconsider the mission of the DOE in light of today's problems, and set up an agency that will insure nuclear materials needs are being met. With every "little" country now capable of being a nuclear power, it is important for them to know that a first priority has been given to maintaining our nuclear arsenal in a ready condition.

**TVA**

The TVA has faced a number of problems in developing its nuclear program. In Section 6.5.3.1, it is stated that in 1985 TVA was required to shut down 5 reactors including Sequoyah 1 and 2 because of charges of mismanagement and inattention to safety requirements. The Brown Ferry Plant fire is not even mentioned. This section also discusses continued problems at TVA operating plants including the assessment of monetary fines. The NRC lists a large number of "violations" at Sequoyah 1 and 2 from 1993 through 1997 the sum total of which shows the continued unwillingness or inability of TVA to manage its nuclear program. Recently, a "whistleblower" at the Watts Bar plants received a death threat (Sunday issue of THE TENNESSEAN, Sept. 6, 1998). This is just the latest of the "whistleblowers" who have tried to call management's attention to plant problems. In view of this operating record, serious doubts exist as to the ability of TVA to carry out the project in an environmentally acceptable manner.

**Specific comments relating to Summary Document**

(comments relate directly to the letter and number code assigned to paragraphs in the Summary Document).

S.1.5.4 - See comments above on Page 1, item 1 relating to the non-proliferation issue.

4(cont'd)

5/09.02

1(cont'd)

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**

Comments to Sohinki, Page 5

S.1.5.5 - Producing tritium in a TVA reactor is not consistent with the Congressional purposes that established the TVA. Its establishment in 1933 had no bearing whatsoever to "national defense". Later, however, it was further developed to insure a reliable supply of electricity for Oak Ridge. This insinuation should be removed.

S.1.6.1.1 - The DOE's record of decision to proceed with this proposal was based on information available prior to 1995. There are other potential options available and issues perhaps not considered that suggests that this decision ought to be re-opened and re-evaluated based on information available today. See also comments relating to S.3.2.3 on Page 6.

S.2 - The last paragraph makes no sense and should be removed. See comments above under S.1.5.5 regarding support of national defense by TVA.

S.3.1.1 - Under Accident Conditions, it should spell out that a reanalysis of the DBA would be needed because of reactivity changes to the core (no mention is made of the use of boron as a chemical shim early in core life and its relationship with the TPBARs, nor of the increased reactivity needed, if any, to accomplish the project. Further, as noted above, an evaluation of the potential energy release from fusion in a degraded core during a "beyond design basis accident" needs to be made and factored into emergency planning as may be needed.

The potential impact on workers involved in fuel operations needs to be evaluated since it is likely that air supplied plastic suits may be needed for their protection due to increased tritium oxide levels in the air above the refueling water canal and fuel storage pool. Adequacy of air supply, the need for communication systems and the potential for increased chance of error, all need to be included in the evaluation.

A potential impact not mentioned is the affect of different metals such as Zircaloy on corrosion interaction with parts of the core and on other primary systems.

6/09.03

7/05.03

6(cont'd)

8/15.05

9/14.09

8(cont'd)

Comment Documents

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**Comments to Sohinki, Page 6

S.3.2.3 - The no-action alternatives are based on the DOE record of decision from a 1995 document. In hind site, it may be desirable to re-evaluate the decisions reached. There are other alternatives and very good reasons to consider them. For example:

- o The manufacture of tritium is an important ingredient in our nuclear defense capability and needs to be protected against stoppage. This can best be accomplished by using redundancy and developing a manufacturing facility at two different sites.

- o It makes no sense to obligate tax payers to "clean up" another nuclear defense site (probable costs to decommission an existing or new reactor site will likely exceed \$ 1 billion) when the DOE already has a number of defense related sites that cannot be economically recovered.

- o A nuclear power reactor cannot serve two masters. Either it is dedicated to making electricity and tritium manufacture takes a back seat, or it can be used to manufacture tritium and electricity generation would take a back seat. The later is what is needed for our defense program.

- o It makes no sense to buy into or use technology and equipment already more than twenty five years old (all of the TVA plants whether operating or not). What does make sense is for the DOE to undertake the design construction and operation of two tritium manufacturing facilities, each one at a different site to insure redundancy, with one of the facilities designed for electric generation. This would enable the DOE to wheel into a grid any excess electric power that might become available, but its primary purpose would be tritium production. Furthermore, additional electricity can be provided to the grid if there is a need to further reduce tritium production.

- o The DOE should not rely on an organization that exhibits mismanagement and inattention to safety matters to operate a facility important to our defense needs. Instead, a new facility would provide an opportunity to design, build and operate a facility with concerned management that will give full attention to safety matters.

7(cont'd)

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**Comments to Sohinki, Page 7

In summary, there are other manufacturing options, although probably more costly, that are much more sensible that should be considered. Reopening of the Record of Decision could enable better alternatives to be evaluated with a 1998 perspective.

S.3.2.4.3 - The Bellefonte plant design and equipment are more than 25 years old. An evaluation of this aged equipment needs to be made, particularly with respect to the reactor vessel, to determine if it can be used safely. In addition, an evaluation of the twenty five year old instrumentation is needed to determine that the wiring and components have not degraded and are capable of meeting today's safety requirements.

It should be noted that utilization of the site for nuclear reactors would immediately impose an eventual burden of an estimated \$ 1 billion just for decommissioning. A question arises as to who will pay for it, the taxpayer or the ratepayer, or a combination of both?

**The following comments refer to specific sections of the Impact Statement:**

1.3.3 - This section discusses DOE's past failure to be a good steward of our nuclear facilities for the manufacture of tritium. No reasons are given for this failure. The EIS needs to discuss what steps have been taken to assure that DOE will handle this project successfully and under good stewardship.

1.3.5 - This section discusses the weak non-proliferation arguments discussed previously on Page 1, item 1.

3.2.5 - There is no mention of the role of the Refueling Water Storage Tank in the hold-up of tritium as a liquid waste. This applies to all of the reactor options. If not vented or disposed of, the tritium in this tank, and subsequently in the refueling water, can increase with each refueling and would require personnel to wear air supplied plastic suits for protection during this operation. This would be an impediment in refueling operations.

4.2.2.4 - A significant source of tritium release to the river can occur if the reactor continues to operate with primary to secondary leakage and the

7(cont'd)

10/21.02

11/20.04

4(cont'd)

1(cont'd)

9(cont'd)

12/14.10

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**

Comments to Sohinki, Page 8

cooling tower is being bypassed. Alternately, a significant increase of airborne tritium oxide will occur if the cooling tower is in full use. This is an important distinction that needs to be made when evaluating the radiation impact on persons off site (as well as on-site). A projected use pattern should be incorporated into projected dose calculations based on past meteorological data and projected power level of the reactor.

Projected estimates of tritium concentration should be made at each of the drinking water supply intakes downstream of the site based on cooling tower use and projected buildup of tritium in Chickamauga Lake during various net flows.

Table 4-21 lists the sources of background radiation exposure to individuals in the vicinity of the Sequoyah site. In reality, the table lists the average exposure to the US population from these sources and not actual "measured" levels at the site. This point should be clarified so as not to be misleading.

There are 8 municipal water supplies downstream from the Bellefonte site. A similar analysis should be made of the projected tritium concentration at each intake based on cooling tower usage, river flow, dam hold-up and meteorological conditions, as suggested for the Sequoyah site.

5.2.5.4 - The socioeconomic section suggests that the cost of decommissioning will be in the range of about 600 to \$ 700 million. In view of the uncertainties in this number, I have increased the estimate I used up to \$ 1 billion, a reasonable increase. The important point is that this obligation is incurred on start-up and is not necessary since the DOE already has thousands of acres dedicated for weapons manufacturing.

It is not clear whether this cost will be incurred by the taxpayer or the rate payer, an important distinction for those of us using TVA electricity.

Table 5-49 on page 5-110 should also list under the beyond-design-basis accident an evaluation of energy release from possible fusion of tritium in the core, using TMI temperature data in the event of a re-criticality of the degraded core.

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**

Comments to Sohinki, Page 9

6.5.2.1 - This section clearly shows the problems of TVA mismanagement as outlined in many NRC inspections and orders. There is no assurance that significant improvement has been achieved. It is difficult to understand why DOE would consider entrusting tritium production, an item vital to our defense, to the nuclear part of this agency.

Appendix A, Page A-18- The last paragraph indicates that more new fuel assemblies may have to be loaded into the core during each refueling and that the enrichment of these assemblies may need to be increased. This indicates that an analysis should be included of flux density, the interaction of chemical shim control on this density over time, and the total impact of this added reactivity on control systems. In addition, a safety analysis is needed to determine the increased risk to personnel as a result of an out-of-core criticality incident and the steps taken to prevent one from occurring.

Appendix D, Page D-4 - A non-reactor incident that requires evaluation is initiated from refueling. Most tritium in the reactor vessel will be in the form of an oxide and will become mixed with the refueling water. With significant leakage, the tritium vapor over the refueling pit, and subsequently in the spent fuel pool may require personnel to wear plastic suits during routine operation. This will cause potential operating problems that should be evaluated. In addition, ventilation from the containment area and the spent fuel pit should be evaluated.

Design of the refueling water storage tank, not mentioned any where, is an important potential release point for tritium in liquid or vapor form. The analysis needs to consider the build-up of tritium in this water with subsequent refuelings and the potential impact on workers and the environment.

Appendix F, Page F-8 - The third box down, refers to comments previously recieved, similar to mine, that the DOE is probably not capable as it now exists to carry out this project in an environmentally safe manner. I fully agree with those who offered these comments. Although the response given by the DOE is that DOE is fully committed to carry out its responsibilities, the fact remains that the DOE has been a poor steward of our nuclear facilities and has not carried out its responsibilities in the past.

**Commentor No. 41: Robert W. Van Wyck (Cont'd)**

Comments to Sohinki, Page 10

There is no assurance that it will do so in the future. See my comments and concern given previously (Page 3, item 1) regarding the ability of the DOE to carry out this mission. The response given to these concerns about the DOE does not provide an adequate response and perhaps demonstrates on their part a negative reaction to honest concerns. What is needed in response is some assurance, based on facts, that the DOE is now prepared to stop fumbling around with our nuclear program and has the resources and capability to make positive progress. If DOE is unable to provide this assurance, then Congress find another way to assure our nuclear defense system will remain viable.

4(cont'd)

Thank you for your consideration of these comments on the Draft EIS.

Sincerely,

*R W Van Wyck*  
Robert W. Van Wyck

CC's With Summary to:

State Senator Keith Jordan  
U. S. Senator Bill Frist  
U.S. Senator Fred Thompson  
U.S. Rep. Bart Gordon

**Commentor No. 42: Gene & Barbara Price****COMMENT FORM**

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801
- ☒ returning this comment form or other written comments to the address on the back

Comments: *We have read the Draft Environmental Impact Statement in its entirety and have read numerous newspaper articles with disinterested Authority that state that the production of tritium at the Bellefonte Plant would be a "grave threat" to our community.*

*We have not heard of any reason for the production to be produced here other than it would provide jobs for local people.*

*The danger for radiation, the employment issue. Therefore we strongly urge you not to use the Bellefonte location.*

*Sincerely, Gene & Barbara Price*

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: *Gene & Barbara Price* (optional)  
Organization: \_\_\_\_\_  
Address: *88 Norberg Rd.*  
City: *Gautsburg, Pa* State: *AL* Zip Code: *35976*  
Work phone: \_\_\_\_\_ Home phone: *582-8462*  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98

1/07.03

**Commentor No. 43: Call-In**

**Comments Received via "800" Number**

Date:	Oct 1, 1998 (11:30am)
Name:	Mr. John????couldn't understand his name--have called and left message to please call the 800 number again and slowly speak his name
Organization:	
Address:	Augusta, GA
Phone #:	(706) 738-3459
Fax #:	
Comment #:	

**Comment:**

I'm sitting here reading in the papers - I'm with the Navy - and for the life of me, I do not understand this latest and greatest of Bill Clinton's move to further dismantle the military and the whole 9 yards in this tritium mess. The Savannah River Site already has things in place to do the tritium and I believe this is nothing more than the Democrat's and nonsense to divert people's attentions elsewhere more or less to punish the voting Republican's. And that I believe is the bottom line for all this nonsense of going commercial to do what SRS has been doing all along concerning this tritium nonsense which is so typical of the Clinton administration.

1/04.01

**Commentor No. 44: W. Lee Poe, Jr.**

10/1/98

**Comments for CLWR EIS Meeting**

**By: W. Lee Poe, Jr.  
807 E. Rollingwood Rd.  
Aiken, South Carolina 29801**

Mr. Rose, Department of Energy, and Stakeholders of the Savannah River Region I would like to provide the following comments on the Commercial Light Water Reactor draft environmental impact statement. Before starting with my comments I would like to thank Mr. Rose for his prompt attention to my request for additional information shortly after I received the draft EIS and having other information sent to me from TVA. This information was either referenced in the DEIS or was discussed in the local press.

Information was requested in the following areas:

- Conversion and use of Bellefonte as a fossil plant producing electric power.
- PNNL test data on TPBARs (assemblies used to produce tritium in CLWR).
- Nonproliferation considerations of using CLWR.
- Cost analysis.

I requested two further issues, one I had hoped DOE would provide me their logic on why was DOE linking the APT, CLWR, and tritium extraction facility (TEF). The other was a request for a comparative table showing the environmental impacts of APT and CLWR + RTF at tonight's meeting. I had requested this information to assist me in reaching my conclusion on which approach is best so I can provide my input to DOE on these matters.

1/05.01

2/04.03

I am still reviewing the information I received but I wanted to provide you with my conclusions tonight, albeit it they may change as I continue to review the available material, on these subjects. I draw the following conclusions. I will attempt to cite the location on the concern in this comment paper but I will not bore the stakeholders with those details in my verbal presentation.

I would like to provide the following comments:

1. DOE has decided to link three EISs, the CLWR + TEF and the APT. They state in the CLWR EIS (p 1-12, Section 1.5.2.1) that if DOE decides not to proceed with the CLWR then DOE will build the APT to produce tritium. The APT EIS was issued in December 1997. They further state (p 1-13, Section 1.5.2.2) that if the CLWR is selected as the primary tritium technology, the TPBARs will be sent to the TEF. Now that is what I call EIS linking. To provide my judgments to DOE, it is necessary to fully read and retain information on each alternative in each of the EISs and produce a comparison table. DOE, you need to provide your stakeholders with tabular guides to help in that situation if you want good comments.

1(cont'd)

2(cont'd)

**Commentor No. 44: W. Lee Poe, Jr. (Cont'd)**

2. Now to complicate the above point, the EISs includes information on primary and back-up technologies. In the CLWR EIS (p 1-13, Section 1.5.2.3) it is stated that if the CLWR is selected as the back-up technology to the APT, a new extraction capacity would required as a stand-alone facility or in combination with the accelerator.

3/05.04

3. The CLWR (p1-12, Section 1.5.2.1) indicates that the FEIS will be issued in December of this year. From what I have heard and read in local newspapers, The Energy Secretary plans to reach a decision on these three tritium EISs in December of this year. I have heard two stories on how this could occur; 1) the decision reached and then the FEISs will be completed and 2) the FEISs will be finalized and the decision will be reached as part of the ROD. If the first approach is the correct, DOE should use the public process to gain stakeholder input to the decision process but not preparing the FEISs. Don't spend the money of preparing the FEISs. The second approach assumes that DOE follows the normal process of finalizing the EISs with proposed actions, then the decision-makers make the decision and incorporate it into the ROD. The timing of completing this EIS and making the decision in this second approach with both decisions occurring in December does not seem consistent. The main point here is that the time spent in commenting should be used by DOE in making the decision.

4/05.29

4. The CLWR EIS is difficult to understand particularly in concert with the above discussed decision. It describes in great detail a number of alternatives (p 3-12) - 18 are described in Table 3-2, which basically are one reactor, two reactors, or three reactors and a very short paragraph on the No-Action Alternative (Section 3.2.4). The impacts of each of the 18 alternatives consume the bulk of the EIS. The impacts shown for the No Action are only summarily given and referenced to the APT EIS. This approach makes evaluation of this EIS difficult.

5/06.06

5. The CLWR EIS states that tritium could be produced in any one of the 105 CLWRs currently licensed to operate (Section 3.2.2) but that the design of the TPBARs reduces irradiation to pressurized water reactors (eliminating boiling water reactors) and only TVA responded to the DOE's RFP to identify utilities interested in either producing tritium or having a reactor available for DOE purchase. The CLWR further indicates that five TVA PWR were to be considered in this EIS; all others having been deleted due to lack of interest by the utilities.

6/06.03

TVA Chairman Crowell defined TVA's response to the DOE RFP differently. In his letter to U. S. Senator Sessions of Alabama, he says TVA submitted two proposals 1) a "revenue offer" to produce tritium at Bellefonte and if needed at the Watts Bar Nuclear Plant and 2) a "service offer" to produce tritium at only Watts Bar. Chairman Crowell further states that TVA allowed the "service offer" to expire and extended the "revenue offer" through July 1, 1998. If this information Chairman Crowell provided to Senator Sessions is correct, why did DOE evaluate alternatives other than those associated with Bellefonte and Watts Bar. The DOE logic of

**Commentor No. 44: W. Lee Poe, Jr. (Cont'd)**

eliminating all PWR other than those of the TVA and then listing TVA reactors that TVA says are not available seems inconsistent.

6(cont'd)

6. If the inter-agency communication is as bad as indicated above, I must question the validity of an alternative that uses the TVA system to produce the nations tritium.
7. The number of TPBARs that must be irradiated to meet the tritium demand is unclear. In one place (p 3-11, Section 3.2.3), it is stated as 6,000 in 18 months or 4,000 per year. In other places it talks about 3,400 per year for each reactor. If both numbers are correct, tritium production will require irradiation in two reactors. Many places in the CLWR EIS talk about 1 or more reactors. If it requires two reactors to meet the tritium demand, DOE should talk about two reactors not 1 or more. If irradiation requires two reactors to meet the tritium demand, the TVA approach is not a viable alternative since they have withdrawn all of the TVA reactors other than Bellefonte.
8. The information contained in the CLWR EIS and the PNNL information sent me (PNNL-11419) seems to indicate that the TPBARs are reasonably engineered to retain tritium. 3,400 TPBARs will be irradiated in a single reactor each year. Each of these TPBARs is designed to hold up to 1.2 grams of tritium and have a design leak-rate of <6.7 Ci of tritium per TPBAR rod. If not damaged, the leakage from the TPBARs will be <22,780 Ci of tritium per year. This is considerably more than the 1,890 Ci shown in CLWR EIS Table 3-13. Why the difference?

7/03.03

6(cont'd)

8/19.04

The EIS describes the "gettered" TPBAR as so good that the produced tritium gas is quickly captured in the solid zirconium material and there is essentially no tritium gas in the rod (p 1-9, Section 1.3.4). This system is so effective that the rods will have to be heated to 1,000°C (1,800°F) under a full vacuum to recover the tritium captured. The TEF EIS (Appendix A) describes the design temperature maximum on the extraction furnace to be 1,100°C. Operating equipment routinely within 10% of the maximum temperatures is not a good practice. This EIS should discuss evidence used by DOE to show that high tritium recovery from the TPBARs can be achieved with reasonable furnace life. If you cannot recover the tritium, its production is worthless.

9/19.05

9. Again I want to thank you for providing me with a copy of the cost data comparing CLWR option to the APT that Acting Secretary Moler provided to Senator Thurmond in mid July. As I review the data from that letter, I see two worrisome points.
- The first is that for Bellefonte a credit is given that significantly reduces the life cycle cost. An equivalent adjustment is not given for the other CLWRs (in existing commercial reactors) nor for the APT. I suspect this is a payback to DOE for the electricity sold from that reactor. I also suspect that other uses of the accelerator would also provide a financial return. I seems unfair to give a credit for the Bellefonte plant and not for the APT.
  - If the irradiation requires two CLWRs to meet the tritium requirements, the CLWR costs increase significantly. What is DOE doing, betting that the tritium demand will decrease significantly thus a single reactor will suffice? I hate to

10/23.15

**Commentor No. 44: W. Lee Poe, Jr. (Cont'd)**

think it might be anything more sinister. In any event, the DOE should be open on these issues.

10. Again thank you for providing me a copy of the Report to Congress titled "Interagency Review of Nonproliferation Implications of Alternative Tritium Production Technologies." I find that it augments the terse statements in the CLWR EIS. I suggest that the report be included in the FEIS as an appendix. It points out correctly that maintaining separation between nuclear power and weapon production has supported the U. S. leadership in the International Atomic Energy Agency and other multilateral organizations involved in civil nuclear activities. It goes on to show that tritium is not legally covered since it is not a special nuclear material. It then provides exceptions to the policy to date (Hanford N-Reactor, U. S. Uranium Enrichment, etc.) It makes the point that because TVA is government agency and the reactor is owned by the government, tritium irradiation would be an extension of past practices of "using government-owned facilities simultaneously for civil and military purposes. This conclusion may be legally the same but I draw a much different conclusion. I conclude this alternative is establishing a damaging new policy. That irradiating a nuclear weapon component in facility designed primarily to produce electric power is OK. I hate to think about how this might be used by other nations. The electricity production will consume a large portion of the neutrons generated by the reactor and the tritium can be considered a secondary product.

Thank you for the opportunity to present my views on this draft EIS. I hope they will be of some value to you in the decision on tritium technology.

10(cont'd)

11/01.09

**Commentor No. 45: Gary Stooksbury**



Fred E. Humes  
Director

Statement for the Record  
Draft Environmental Impact Statement  
Production of Tritium in a Commercial Light Water Reactor

My Name is Gary Stooksbury and I am a Director of the Economic Development Partnership of Aiken and Edgefield Counties of South Carolina. My organization is proud of Savannah River Site's past role in supporting our national defense and making the world a safer place. We believe that the Site can continue to have a positive impact in addressing the many challenges still remaining. None are more important than (1) assuring a reliable supply of tritium for our national defense and (2) preventing the spread of nuclear weapons technology and materials throughout the world. Unfortunately, the Department of Energy's proposed action in this EIS will undermine both of these objectives: it will put in jeopardy an assured supply of tritium for our national defense and it will encourage other nations to use their civilian nuclear programs to produce materials for nuclear weapons. I want to briefly explain my organization's basis for objecting to the use of Commercial Light Water Reactors for tritium production and I will provide specific comments on inadequacies in the draft EIS document.

**Program Policy Issues**

As your documents note, tritium is absolutely necessary for the proper functioning of modern nuclear weapons, and without an adequate supply, our nuclear shield would be greatly diminished. DOE has set out to evaluate alternate technologies to meet this need, and has narrowed the choice to two options; the CLWR and the Accelerator - the Dual Path approach. My organization and others have serious reservations about the ability and appropriateness of the CLWR option to meet the Tritium mission. Specifically

1. CLWR will severely undermine this nations ability to pursue international nonproliferation objectives.
  - While we are dissuading others from producing military materials in their civilian nuclear programs, we, **for the first time in our history**, are proposing to adopt that very same course. Other nations will rightly accuse the United States of hypocrisy.
  - The Interagency Review which examined this question was flawed in its logic and vague in its conclusion. It erroneously implies that because we have previously converted weapons facilities to civilian applications it is acceptable to do the converse. It concludes that these concerns could be "satisfactorily

1/01.04

***Commentor No. 45: Gary Stooksbury (Cont'd)***

addressed” without stating if we will lose leverage with other nations who are contemplating nuclear weapons programs.

- If our actions cause even one nation to disregard restraint and to initiate or continue to make weapons materials in commercial nuclear reactors, we have suffered a foreign policy defeat with profound impacts for the world at large.

A worldwide outcry will result if the United States backs away from its strong nonproliferation stance, and eventually will require that the CLWR be abandoned - **with damage to our world image and adverse impacts on our nuclear stockpile.**

2. We believe that there are significant uncertainties in the ability to license a CLWR to produce tritium for use in nuclear weapons.

- First there will be public concern over the new safety and environmental hazards resulting from the routine and accidental releases of tritium from the reactor system.
- Secondly, many citizens are very uncomfortable with the idea of co-mingling military purposes in a civilian reactor

**There is no assurance that NRC will issue a license (or license amendment) for this endeavor.** Again, this would cause the **CLWR option to be abandoned with adverse impacts on our nuclear stockpile.**

3. Our third issue is costs. DOE has significantly underestimated the capital costs associated with the CLWR option.

- Much “hype” has been attributed to the supposed lower cost estimate for the CLWR option, **but that estimate has never been revealed and subjected to independent third-party review.**
- The DOE Draft EIS discusses at length the use of TVA’s Watts Barr and Sequoyah nuclear facilities, yet it has been widely reported that TVA has withdrawn those facilities.
- DOE cites the TVA estimate of \$2.446 Billion to complete the Bellefonte I Reactor, which, according to the EIS document, cannot meet the START I tritium requirements, and then compares that estimate to the APT which will produce adequate tritium to meet START I requirements. Completion of both the Bellefonte I and II reactor units will be required to produce three kilograms of tritium per year, with capital costs in excess of \$6 Billion
- It has been reported that another nuclear utility has estimated that over \$4 Billion would be required to complete Bellefonte I.

*1(cont'd)*

*2/21.06*

*3/23.17*

***Commentor No. 45: Gary Stooksbury (Cont'd)***

- The GAO states that TVA estimates are very unreliable, with overruns of several hundred percent being experienced for plants which TVA asserted to be 80% complete.
- The Congress Research Service review raises a serious question on the ability of the Bellefonte to generate sufficient revenues to offset operating costs - much less amortize construction.
- On the other hand, estimates for the APT have been subject to public review and validated by DOE.

It is our opinion that capital costs for the Bellefonte reactors will be significantly more than for APT, and life-cycle costs will be comparable. **The available cost data supports the APT option for tritium production**

In summary, we conclude that there are no programmatic advantages to the CLWR option, but rather it has serious, if not fatal deficiencies. The Department of Energy has a Dual Path strategy in name only because the **CLWR option leads to a dead end.**

**Deficiencies in the Draft EIS**

We believe that the Draft EIS has not addressed the full range of expected safety and environmental impacts associated with the CLWR option and therefore is deficient with respect to requirements the National Environmental Policy Act and implementing Council on Environmental Quality regulations. Specifically:

1. You have not identified and assessed the world-wide environmental impacts that would result from a federal action to approve the CLWR option.
  - Adoption of the CLWR option will undermine international nonproliferation objectives, and result in a higher probability that some nations will initiate or continue nuclear weapons research, testing and production programs.
  - Adoption of the CLWR option will result in a higher probability that some nations will initiate or continue to actively pursue production of materials for nuclear weapons in their civilian nuclear facilities.
  - The increased incidence of nuclear weapons research, testing and materials production programs by non-nuclear states, will have **environmental impacts which must be analyzed and included in this EIS.**
2. The evaluation of Human Health Effects from Facility Accidents (Appendix D) is not adequate, with three deficiencies:

*3(cont'd)*

*4/04.01*

*5/05.07*

*6/15.07*



### Commentor No. 45: Gary Stooksbury (Cont'd)

- The basis for estimating that 10 percent of tritium released from the melted targets will be in the oxide form within the containment atmosphere is not documented (Table D-1). In some past safety analysis reports, DOE has assumed that 100% of released tritium is in the oxide form and available for release to the environment. Please fully explain the basis for your assumption and revise your analysis.
- Elemental tritium may be available in the containment atmosphere and released to the environment. Your analysis needs to quantify the estimated release of elemental tritium and resultant safety and environmental effects.
- Your analysis does not address the disposition of tritium remaining in the reactor facility after the first thirty days (Table D-2). Since tritium is very mobile and cannot be easily removed from contaminated coolant water, how much additional tritium will be released to the environment, and with what effects? Also, what is the long-term disposition mechanism and associated environmental impacts for tritium which remains within the containment structure?

The draft EIS need to be corrected to address the environmental impacts associated with the disposition of all tritium released in a design basis accident.

- The draft EIS does not evaluate the environmental impacts of all program options under consideration.
- Your Draft EIS states that a one reactor option could not produce the required three kilograms of tritium per year, and your safety and environmental analysis is based on using two or more reactors.
- As noted earlier, DOE budget projections assume that the tritium need can be met with one reactor.
- When asked about this discrepancy DOE stated that a special TPBAR design and fuel cycle, different from that described in the draft EIS, is being contemplated which will allow one reactor to make three kilograms of tritium per year. This option is not identified and evaluated in the draft EIS.

If a one reactor option is being considered, then this EIS needs to be corrected to describe and analyze the appropriate TPBAR design and fuel cycle. If two or more reactors are needed, then DOE's program and budget planning needs to reflect that fact.

Thank you for the opportunity to comment on this draft EIS.

6(cont'd)

7/03.03

8/23.15

7(cont'd)

### Commentor No. 46: Jason J. West



#### COMMENT FORM

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: In addressing the so-called non proliferation issue, the equally is more important to me than the environment. The United States should not have to tip toe around through nations or justify our actions to them. Nations such as North Korea, Libya, and Iraq don't need an excuse to produce nuclear weapons and attempting to implement a program that is in no way questionable will weaken the very goal that such a program would try to accomplish the national defense. In considering causing the military use of civilian sites and saying is in violation of nonproliferation, I see a case of not seeing the forest for the trees. If the United Kingdom or Britain or China wanted to follow a similar program how could that possibly violate nonproliferation. Nations that do not have the bomb should not even be concerned because at the very fact that they don't have the bomb! This tritium production proposal has nothing to do with nuclear nonproliferation. In my opinion saying that the rest of the world cannot make the distinction between fissile materials and tritium is insinuating that the rest of the world is full of fools which would be a foolish assumption for DOE or DDC to make.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Jason J. West (optional)  
 Organization: student  
 Address: 354 Lake Dr.  
 City: Aiken State: SC Zip Code: 29801  
 Work phone: \_\_\_\_\_ Home phone: (803) 647-7800  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

**Commentor No. 47: Xerxes Wahl****Comments Received via "800" Number**

<b>Date:</b>	October 5, 1998
<b>Name:</b>	Xerxes Wahl
<b>Organization:</b>	
<b>Address:</b>	8971 Lentzville Rd. Athens, AL 35614
<b>Phone #:</b>	(256) 729-8867
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am against that personally. I don't see why we need more of it when it's my understanding we're already dismantling a lot of nuclear weapons that have been made already which I'm not sure that is a good idea or not but since we're doing that, I don't see why we need to make new ones. Since I live near that Plant here, I'm against it. If you need to get in contact with me, that would be great, if not, that's fine too. Good bye.

1/02.01

2/07.03

**Commentor No. 48: Anonymous (2)**

AddressID: 40 Date Updated: 8/28/98 7:49:40 PM  
 First Name: MI: Last Name: Title:  
 Organization:  
 Address:  
 City: Knoxville  
 State or Province: TN Postal Code: 37919- Country: USA  
 Work Phone: Fax Number:  
 Email Address: Arista12@aol.com Home Phone:

**Notes:**

I think that the goal of producing more tritium to "add to the nuclear stockpile" is ridiculous. The United states does not need any more nuclear warheads. We currently own 8500. Increasing that number would be in direct violation of not only of a nonproliferation treaty, signed by President Nixon in 1979, but also a more recent ruling by the International Court of Justice (1996) that the United States is obligated to pursue disarmament. More tritium means more bombs, and who are we planning on blowing up anyway? As I'm sure you are aware of, tritium is not something you want produced near you or your family because of its harmful effects on people( genetic abnormalities , health problems etc.)However, where ever tritium is produced, there will be people, and those people will be effected as a result. Write back if there is a real person reading this, if not you'll be hearing from me anyway!  
 arista12@aol.com

1/02.01  
2/01.04

3/14.04

**Commentor No. 49: Stewart Horn**

**Comments Received via "800" Number**

Date:	Oct 6, 1998
Name:	Stewart Horn
Organization:	
Address:	498 Keel Hollow Road New Hope, AL 35760
Phone #:	(256) 955-2114 (work); (256) 723-4960 (home)
Fax #:	
Comment #:	

**Comment:**

I am very opposed to the use of Bellefonte as a tritium plant. I know the reactor there was designed probably 25 years ago or 20 years ago at least, if not earlier. So the reactor design is old and outdated. I think it would place all of the people in this area in jeopardy to harm from a potential accident especially using an outdated reactor design. I know that this plant will put radiation into the water and to the air. My understanding is the reason it was stopped before was because of the high cost in meeting environmental requirements, so does that means they won't be met now? I'm very interested in receiving documentation on what the plan is. I would be interested in receiving information about the location of the public hearing, which apparently is going to be on Tuesday night, October 6. Please call me with that information if possible ahead of the meeting so that I could possibly attend. Thank you very much. Please send any information that you have, relative to the use of Bellefonte in this way. Thank you.

1/21.02

2/09.04

**Commentor No. 50: Mike Wahl**

**Comments Received via "800" Number**

Date:	October 7, 1998
Name:	Mike Wahl
Organization:	
Address:	8971 Lentzville Rd. Athens, AL 35614
Phone #:	(256) 729-8867
Fax #:	
Comment #:	

**Comment:**

I would like to express for myself and my family the desire that the Bellefonte Plant not be used for tritium production. Our North Alabama area already has one nuclear plant whereby we have no successful way of removing waste from that facility. Until those sorts of problems are resolved, Alabama has no business being involved with another facility that deals with that general sort of environmental endangerment. Thank you.

1/16.04

**Commentor No. 51: Herman & Sylvia Zaage**

To the Dept. of Energy  
FAX: 1-800-631-0612

Please honor the Atomic Energy Act, Section 57e, and cancel the plans for using commercial nuclear reactors for the development of Tritium for nuclear weapons. This is a serious public health issue. Tritium contamination has been linked with developmental, reproductive and other health problems.

Thank you.

Herman & Sylvia Zaage  
160 Simonson Ave.  
Staten Island NY 10303  
sylhz@aol.com

1/01.09

2/14.04

**Commentor No. 52: Ms. Bizzarri****Comments Received via "800" Number**

<b>Date:</b>	Oct 12, 1998
<b>Name:</b>	Ms. Bizzarri
<b>Organization:</b>	
<b>Address:</b>	Tuxedo Park, NY
<b>Phone #:</b>	(914) 351-2652
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I'm calling to leave this message. Please honor the Atomic Energy Act, Section 57e, and cancel the plans for using commercial nuclear reactors for the development of tritium for nuclear weapons. I'd like to stress too that tritium contamination has been linked to developmental reproductive and other health problems. Thank you.

1/01.09

2/14.04

**Commentor No. 53: Judith Hallock**

**Comments Received via "800" Number**

Date:	Oct 12, 1998
Name:	Judith Hallock
Organization:	
Address:	269 Running Creek Cove Woodier, NC 28789
Phone #:	(828) 586-3146
Fax #:	
Comment #:	

**Comment:**

I think this is a terrible idea. I don't think we would be violating the nuclear non-proliferation treaty, which obligates all nuclear nations to pursue complete disarmament by producing weapons-grade tritium in commercial reactors and/or by the accelerator that Strom Thurmond wants built in South Carolina. We don't need to produce tritium, it has a short-half life. We need to make it when we need it, right now we don't need it, we've got plenty of weapons. It cost huge amounts of money, it's dangerous, the production is dangerous, and the storage is dangerous. There are genetic abnormalities and other health problems that have been linked in laboratory animals to tritium and I am very much opposed for these reasons to making tritium in commercial reactors or in accelerators. We already have 8,500 warheads. I don't think we need anymore. I think that's plenty. If we need it later, we can talk about it, but right now, I don't think we need to be in a hurry to produce tritium. Thank you very much. Goodbye.

1/01.04

2/02.01

3/23.13

4/14.04

2(cont'd)

**Commentor No. 54: Congressman Robert Aderholt**

CONGRESSMAN ROBERT ADERHOLT  
10/6/98

**STATEMENT TO BE READ AT RAINSVILLE**

I have been pleased to work with the Alabama delegation and Members from Tennessee and with TVA to help prevent a great injustice in the defense authorization bill for fiscal year 1999. As you know, some Members of Congress and Senators support building a facility in South Carolina to use a particle accelerator for producing tritium. Supporters of this option tried to pass bill language which would have prevented the use of any commercial light water reactor for producing tritium. Clearly, all the facts, from safety, to national defense readiness, to budgetary issues point to the completion of the Bellefonte plant as the best option. I spoke on the House floor, sent two staff members to the Bellefonte plant, spoke with NBC News, and lobbied other Members through several letters to my colleagues. Several Members of Congress and Senators have been very involved. I especially appreciate the outstanding leadership of Senator Jeff Sessions. I have also enjoyed working with TVA and a number of community leaders on this effort. A significant battle was won when the Graham language was removed from the final bill, but between now and October 1, 1999, we must continue to defend the truth about this situation and educate other Members of Congress. I look forward to continuing to work with TVA, the Alabama delegation, and community leaders on this effort. Completing the plant at Bellefonte to produce tritium is simply the right thing to do for the U.S. taxpayers, and its completion would have an enormous, potential benefit for north Alabama.

1/07.03

Commentor No. 55: Mayor Philip Anderson

As mayor, of the Town of Dutton, it is my opinion that the production of Tritium in the Bellefonte Commercial Light Water Reactor at the Bellefonte Nuclear Plant would be a very big plus for all of Jackson County and the surrounding areas.

I am asking the Department of Energy to give serious consideration in using the Bellefonte Plant for Tritium Production.

*Philip Anderson*  
Philip Anderson  
Mayor

1/07.03

Commentor No. 56: Melvin L. Brewer**IRON WORKERS LOCAL UNION NO. 704**

INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS

2715 BELLE ARBOR AVENUE

CHATTANOOGA, TENNESSEE 37406

MELVIN L. BREWER  
Business Manager

423 / 622-2111

FAX 423 / 622-2112



Good Evening

I am Melvin Brewer, Business Manager of Local 704 of the International Association of Bridge, Structural, Ornamental and Reinforcing Ironworkers from Chattanooga, TN.

On behalf of our 600 plus members I would like to voice our support for the proposed Commercial Light Water Reactor for the production of Tritium Gas at Bellefonte.

Savannah River Site does not meet the 2005 production of tritium mandated by the President and Congress.

Accelerator Production of tritium requires a 500MW power source for operation. Bellefont will actually produce power.

As the safety of the plant, TVA has an excellent record. Accident risk for Bellefonte is one fatal cancel every 245 million years and transportation risk is less than one fatal cancer per 100,00 years.

Additional low-level waste is about 1% of TVA current volume.

While the accelerator is an un-proven method, Commercial light water method has been proved at Watts Bar. With Watts Bar and Sequoyah as a back-up, this plan will insure the country's supply of tritium for it's National Defense needs.

As Tritium production in a commercial reactor is not prohibited by International nor the United States law. Therefore, the benefits out weight the risk.

THANK YOU !

1/07.03

**Commentor No. 57: U.S. Congressman Bud Cramer**

COMMITTEE ON  
APPROPRIATIONS



**BUD CRAMER**  
5TH DISTRICT OF ALABAMA  
U.S. HOUSE OF REPRESENTATIVES  
October 6, 1998

E-MAIL: [budmail@mail.house.gov](mailto:budmail@mail.house.gov)  
WEB PAGE: <http://www.house.gov/cramer/welcome.html>

Dear friends:

I am pleased to have this opportunity once again to offer my strong support for the completion of the Bellefonte plant to produce tritium.

I believe that the Department of Energy's environmental impact study clearly shows that Bellefonte is a safe, practical choice for tritium production.

The Congressional Budget Office recently released a report that shows how Bellefonte is an economically sound choice as well.

When you add the strengths that Bellefonte has to offer with the work ethic and quality of life in northeast Alabama, I think it is plain to see that our community is the ideal choice for this project.

The completion of Bellefonte would create 800 permanent jobs and 2500 construction jobs in our area. We recognize that tritium production offers not only an extraordinary economic opportunity for our community. This is also an enormous responsibility that is critical to the defense of the United States. I know that our local communities possess the talent and tools to make this program a major success.

Congress is quickly approaching the end of this year's legislative session. I regret that legislative business in Washington prevents me from being with you this evening. But please know that I am here working to make sure that Bellefonte is given full and fair consideration for this project. We recently won a victory for Bellefonte when we managed to turn back a bill that would have left Bellefonte out of consideration. We succeeded in getting that bill dropped and keeping Bellefonte's standing alive and well.

Thank you all for being here this evening and thank you for your concern about this important issue.

Sincerely,

**Bud Cramer**  
Member of Congress

24 A BARNUM BUILDING  
WASHINGTON, D.C. 20515-0500  
(202) 225-4801

401 FRANKLIN STREET  
FENTONVILLE, AL 35041  
(205) 251-4330

12214 JONER STREET  
MUSCLE SHOALS, AL 35661  
(205) 251-4330

MORGAN COUNTY COURTHOUSE  
BOX 668  
DUEATON, AL 35962  
(205) 255-0400

THIS MAILING WAS PREPARED, PUBLISHED, AND MAILED AT TAXPAYER EXPENSE  
Printed on Recycled Paper

**Commentor No. 58: John J. Federico Jr.**

My name is John Federico and I live in Guntersville. I attended the last meeting held here at the college and spoke in opposition to the tritium project. After the meeting, my wife and I were approached by Nick Kazanas, the Bellefonte plant manager, who invited us to tour the plant so we could better understand how the plant would operate. Last month a small group of concerned citizens from Guntersville visited Bellefonte and I personally came away with the feeling that if the plant came on line tomorrow it would be operated safely. Mr. Kazanas and his people were extremely knowledgeable and professional and answered many tough questions.

However, my concern focuses on the ominous partnership that would occur between TVA and DOE as a result of the tritium project. The environmental record of the DOE by its own admission is horrific when it comes to the way it has conducted its nuclear business over the span of the Cold War. It has created numerous superfund sites that will take years and millions of dollars to clean up. Having said that, what I find objectionable in the draft environmental impact statement is reference to a Dec 95 Record of Decision that states DOE can initiate purchase of an existing commercial reactor (operating or partially complete - such as Bellefonte) or buy reactor irradiation services with an option to purchase the reactor for conversion to a defense facility. Mr. John Scalice, the chief nuclear officer for the TVA recently provided some interesting clarification and facts about TVA's nuclear program in a recent newspaper article. He stressed that one of the main reasons TVA's nuclear program is safe, reliable and productive is because it continues to meet external peer review, external regulatory review and external fiscal review.

1/07.03

2/08.02

3/05.27

Commentor No. 58: John J. Federico Jr. (Cont'd)

If DOE should choose to purchase Bellefonte, all the checks and balances Mr. Scalice referred to will disappear because a DOE nuclear defense facility is not governed nor licensed by the Nuclear Regulatory Commission, nor is it obligated to adhere to the standards of excellence for the industry set forth by the Institute of Nuclear Power Operations. My final concern is the storage of spent fuel. If the Nuclear Waste Policy Act of 1982 mandates that spent fuel will be managed at a national repository, then DOE needs to expedite and assist in resolving the siting issues and not create additional on-site spent fuel storage facilities.

3(cont'd)

4/17.03

In closing, this is what I know. When you go to a race track to gamble, you bet the horse based on its track record. The track record of the TVA speaks for itself. As tax and rate payers is it smart to let \$4.5 billion spent to get Bellefonte where it is today just sit there and not realize a return on the investment? I don't think so! But do I bet on the horse named DOE who can turn Bellefonte into some of the other horses in their stable such as Hanford, Rocky Flats, Oak Ridge, and Savannah River? Definitely not! Idealistically, I say do nothing that puts citizens and the River at risk. One cancer death in 50 million years is one too much. But realistically I do believe that Bellefonte can safely do their part for the DOE which will help keep the nations nuclear stockpile credible while producing electricity. And we have to trust that everyone will be safe while we hold the outside eyes and ears of the industry accountable for doing their jobs. I also realize this is about jobs.

5/09.01

3(cont'd)

2(cont'd)

1(cont'd)

Commentor No. 58: John J. Federico Jr. (Cont'd)

When I reached out to the politicians for help in stopping this project, I was told I was naive to think that local citizens cared about what could happen in 20 years, when many were only focused on buying groceries this coming Friday.

But this must be where it starts and stops. If Bellefonte comes on line, it must never be allowed to become a government owned-contractor operated defense facility that will go unchecked by the mechanisms designed to assure it is managed with the safety of the citizens and environment as its primary concern.

3(cont'd)

Based on the above, I feel that paragraph 5.1.6.1.1, page Summary 9 as it pertains to conversion to a defense facility should be deleted and the Dec 95 Record of Decision be amended accordingly. Further, revise the last major planning assumption of para 5.3.2.1 on page Summary 17 to state that spent fuel rods resulting from the tritium project will be stored at an existing spent fuel storage facility until the National Repository becomes operational IAW the Nuclear Waste policy Act of 1982.

6/06.05

4(cont'd)

*John J. Federico, Jr.*  
 John J. Federico, Jr.  
 2041 Buck Island Dr.  
 Guntersville, AL 35976-8579  
 (256) 582-4459  
 E-Mail: pjfed@juno.com  
 10-6-98



Commentor No. 59: Ronald L. Forster



CATARACT, INC.  
An RCM Technologies Company  
2500 McClellan Ave., Suite 350  
Pennsauken, NJ 08109  
609/ 317-0200 Tel  
609/ 486-0802 Fax

Tuesday, October 06, 1998

Ronald L. Forster  
14 Hillcrest Ct.  
Ringgold, GA 30736  
706.937.4304

To whom it may concern:

I am in full support of the completion of the Bellefonte Nuclear Plant for the production of tritium for the following reasons:

- (1) Completion of the Bellefonte plant would be much sooner than that of the Proton Accelerator Plant. The production of tritium in an operating reactor is proven safe and efficient (not an experimental process).
- (2) Funding for completion of the plant will come from taxes. Projected funding for completing the plant is approximately \$2 billion. The alternative Proton Accelerator Plant would cost approximately \$12.9 billion, a cost of \$10 billion or more to taxpayers. *12.9*
- (3) Future operation of the Bellefonte plant will provide a clean source of electricity for the area and the nation's increasing demand. Also a portion of the revenues collected from the sale of this electricity will be returned to repay the taxes use to complete the plant; whereas the Proton Accelerator Plant will be non-incoming producing, and a lasting debt.

Cordially,

Ronald L. Forster  
South Central Regional Manager  
Cataract, Inc. (An RCM Technologies Company)

1/07.01

Commentor No. 60: Roger Graham

**Tennessee Carpenters Regional Council**

United Brotherhood of Carpenters and Joiners of America  
Established August 12, 1881  
1451 Elm Hill Pike, Suite 106  
Nashville, TN 37210  
(615) 366-3303 (615) 366-3149 fax



I am Roger Graham of Tennessee Regional Council, Carpenters Local 74. I am here tonight to speak in favor of tritium production in the U.S.A. I think when our young people are sent to put their lives on the line, to protect us and our country, WE owe it to them to have the most advanced weapons that can be had. I don't care if the tritium is produced in Alabama or South Carolina, but I do think OUR elected officials should be prudent in all decisions concerning OUR tax dollars. Now Bellefonte Nuclear Plant can be ready to produce tritium for less than 3 billion dollars in a proven safe technology, that will produce revenues by the sale of much needed electricity--versus the cost of building an accelerator plant at the cost of 16+ billions a year that we are not sure will work, but will cost 155 million a year to operate. It is our money, America, speak out.

Thank you,

Roger Graham

1/07.03

**Commentor No. 61: James H. Green****COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: Mr. Schiaki,

I've reviewed the EIS and would like to applaud the people who prepared the document. I know it represents a great deal of hard work and dedication on the part of those who wrote the EIS.

I would like to respond in kind by saying that both myself and many other people in the northeast Alabama area are willing to give the same hard work and dedication in support of the production of tritium at Bellefonte Nuclear Plant.

I have 16 yrs. experience in TVA's nuclear program and am thoroughly convinced that nuclear is the way of the future. I have a highly technical background and personally know of many other people in this area with similar backgrounds who are avid supporters of the Bellefonte Tritium Production Project.

We are all eagerly awaiting the opportunity to assist in completing Bellefonte and helping operate the plant in a safe, efficient manner. We just need the chance to prove it.

So let's go, DOE! Let's build Bellefonte and produce tritium!

Sincerely,  
James H. Green

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: James H. Green (optional)

Organization: TVA

Address: 865 Clemmons Rd.

City: Scottsboro

State: Ala.

Zip Code: 35769

Work phone: (256) 437-4317

Home phone: (256) 574-1997

Fax:

E-Mail Address:

7/4/98

**Commentor No. 62: Mayor Elizabeth Haas****TOWN OF HOLLYWOOD**

P.O. Box 240  
Hollywood, Alabama 35762  
Phone 259-4845



10-6-98

DOE Public Meeting

Ladies and Gentlemen and Officials:

I am sorry I can not be at this meeting tonight to give my support to TVA in their endeavor to open the Bellefonte Plant for the production of tritium.

We have heard all the reasons not to produce tritium at Bellefonte and the danger this would be to our citizens and our environment. If all these dangers are true, then why is Akin, South Carolina working hard to get DOE to choose that plant for the production of tritium?

I highly support TVA.

The reopening of Bellefonte will be a boost to our economy in Jackson County and the State of Alabama.

Thank You,

Elizabeth Haas

Mayor of Hollywood, Al.

1/07.03

### Commentor No. 63: Randall L. Hartwig

DOE Public EIS Meeting  
at Northeast Alabama Community College  
on October 6, 1998

Comments of: Randall L. Hartwig

Union position: Valley-Wide Officer - Treasurer for the Engineering Association, Inc. (EA)

The Engineering Association is the union that represents 3500 TVA employees in positions involving professional engineering, architectural, chemical, economic, and computer systems functions, all employees in positions involving professional scientific and program planning and administration functions, and all employees in positions involving inspection, aide, or technical functions in engineering and scientific fields.

#### ENVIRONMENTAL IMPACTS OF OPERATION OF BELLEFONTE REACTORS

- EIS verifies that the incremental impacts of producing tritium in a commercial reactor are small with no measurable health effects.
- No air quality standards will be exceeded.
- No impacts to threatened or endangered species are expected.
- There will be a visual impact from the cooling tower vapor plume.
- Minimal impact on Guntersville Reservoir (0.2% of the flow).
- Minor impacts to aquatic resources from impingement in cooling water intake screens.
- Positive socioeconomic impacts
  - 800 Bellefonte workers
  - Up to 800 indirect jobs
  - Unemployment rate would stabilize approximately 2 % below current levels.

#### RADIATION EXPOSURE

##### SOURCES OF PUBLIC RADIATION EXPOSURE

- Natural Radon - 200 millirems per year
- Cosmic Radiation - 28 millirems per year
- Medical X-Ray - 39 millirems each time
- Nuclear Medicine - 14 millirems each use
- Drinking Well Water - 1 to 6 millirems per year
- 5 Hour Airplane Flight - 2.5 millirems
- Eating Food Grown with Phosphate Fertilizers - 1 to 2 millirems per year
- Wearing porcelain dental crowns or dentures - 0.7 millirems per year
- Bellefonte Reactor Operation with Tritium Production - 0.58 millirems per year
- Cooking with Natural Gas - 0.4 millirems per year
- Bellefonte Reactor Operation - 0.26 millirems per year *32 millirems/yr*

##### PUBLIC RADIATION EXPOSURE COMPARISON

- Average U.S. resident (Background) - 363 millirems per year
- Resident of Denver, Colorado (Background) - 442 millirems per year
- Resident of Jackson County, AL (Background) - 355 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation) - 355.26 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation with Tritium Production) - 355.58 millirems per year

### Commentor No. 63: Randall L. Hartwig (Cont'd)

Large scale production of tritium in a CLWR is currently being demonstrated at the Watts Bar Nuclear Plant.

There are eight TPBARs in four Lead Test Assemblies in TVA's Watts Bar Reactor for a single, normal operating cycle. When the demonstration is over (~~May~~ 1999), they will be delivered to a DOE laboratory for subsequent examination.

The lead test assembly (LTA), currently producing tritium in the core of the Watts Bar Reactor, is ~~near~~ <sup>just</sup> the midpoint of its production and all indications and measurements of the reactor core and the LTA demonstrate that tritium production is proceeding as expected.

TVA has emphasized reactor safety over tritium production at Watts Bar. Reviews conducted to date have revealed no technical issues which would impact safe operation of the plant. Tritium is normally produced in the reactor coolant. Worst case tritium release assumptions are well below the Federal environmental limits. Therefore, the environmental impact from tritium production is minimal.

There are no major (and few minor) modifications that are needed for large scale production of tritium at either the Watts Bar or Bellefonte Nuclear Plants.

The large scale production of tritium in a CLWR involves relatively minor changes to the (nuclear) design of the reactor core.

The removal, packaging and shipment of the tritium production assemblies can be conducted during normal scheduled refueling outages with minor modification of established refueling procedures.

The TVA engineering workforce is technically robust and has consistently demonstrated its ability to solve the most difficult technical and regulatory challenges. This has been conclusively demonstrated by the recent INPO 1 Rating at Browns Ferry and Sequoyah Nuclear Plants and the outstanding ratings (SALP 1) received from the NRC for the Engineering support at our operating plants.

TVA engineering workforce is completely capable of providing the technical expertise necessary for the large scale production of tritium at TVA's Nuclear Power Plants. TVA responded in *DOE RFP DE-RP02-97DP00414*, that there are 375 employees currently with Bellefonte experience and 3584 employees with nuclear experience within TVA. Also there are over 50,000 in the labor workforce with nuclear experience.

#### CONCLUSION: BELLEFONTE SHOULD BE THE PREFERRED ALTERNATIVE!

The draft CLWR EIS does not identify a preferred alternative for producing tritium. A no action alternative is for DOE to build an accelerator in South Carolina. After reviewing the draft EIS and comparing the potential impacts associated with the alternatives, including the no action alternative, The EA believe that the preferred alternative should be identified as any alternative that includes Bellefonte. This belief is based on the following:

- Negligible environmental impacts with no measurable health effects.
- Positive socioeconomic impacts supporting economic growth and development
- Flexible tritium production capacity to meet changing tritium needs
- Proven technology compared to the No Action alternative
- No proliferation issues that are not manageable under existing laws and controls associated with CLWRs
- Least Total Life Cycle Cost

Randy Hartwig, 10-06-98

1/07.03

Commentor No. 64: Mayor Glenda H. Hodges*Town of Woodville*

P.O. Box 94 • 26 Venson Street  
Woodville, Alabama 35776  
(205) 776-2860  
Fax: (205) 776-2796

October 2, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
ATTN: Mr. Stephen Sobinski  
P.O. Box 44539  
Washington, D.C. 20026-4539

Dear Mr. Sobinski:

In February 1998, the Woodville Town Council adopted a resolution in support of the production of tritium at the Bellefonte Nuclear Plant, and our position has not changed.

We believe that the production of tritium at Bellefonte poses no danger to the public and we feel confident that the plant can be operated in a completely safe manner.

Since the production of tritium by the Commercial Light Water Reactor method can be accomplished as a by-product of production of electricity, utilization of the Bellefonte Plant seems to be the most feasible and logical choice to produce the tritium needed for our national defense. North Alabama is proud of the contributions made and continue to be made to our nation's military programs.

Also, utilization of the Bellefonte Plant would provide an economic boost to an economic depressed area of our state. Therefore, for the above reasons, we continue to offer our support.

Sincerely,

*Glenda H. Hodges*  
Glenda H. Hodges,  
Mayor

1/07.03

Commentor No. 65: Jyles Machen

## Statement to DoE / EIS Meeting

It is seldom in a country as large as ours that an opportunity presents itself which will be a win for everyone involved.

The defense program must have a new source for tritium in order to preserve our core nuclear weapons stockpile as permitted under the START Treaty.

DoE is mandated to make a decision on where to produce tritium by December 1998. It should be an easy decision.

The TVA Bellefonte site meets the schedule requirements. Reactor 1 is more than 85% complete and the design requirements are firm. TVA has recent experience in getting through the NRC licensing maze, and tritium production can begin by the DoE target date.

The special-built tritium rods are functioning as expected with no problems at the Watts Bar demonstration site. And Watts Bar <sup>will be</sup> a backup production site until Bellefonte is ready.

Tritium produced at Bellefonte will be transported in its solid state to a new \$400M extraction facility at the DoE Savannah River site, providing employment for 250-350 people.

*Insert P*  
*If the Bellefonte Site is selected for Tritium production,*  
TVA gets a completed reactor vitally needed for the region's power grid, the nation gets its vitally needed tritium for defense, and Savannah River gets the extraction/conversion facility in South Carolina. Even their Congressman Lindsey Graham, said in a 1995 detailed report to the Speaker of the House, that a commercial light water reactor [Bellefonte] is the way to produce tritium. So everybody wins.

So what's the problem? Some say the proposed Markley-Graham language in the Defense Authorization Bill, which excluded TVA, was nothing but parochial, preventing competition, costing billions more, while risking an untested accelerator. *Fortunately, that language was removed in the Conference between the Senate and House.*

Others are concerned about nuclear power plant safety. There are 110 nuclear power plants operating in the U.S. and not a single death by radiation exposure can be documented, ~~as is even suspected~~. While some scare stories are spread, no factual backup is provided.

Let's get on with the program. I encourage a fair evaluation and timely decision by DoE. TVA, I believe, is up to the job. The nation's largest power producer whose Browns Ferry and Sequoyah nuclear plants recently earned the highest performance evaluation rating possible, has new leadership and positive management and can again serve the nation and our region.

*Insert #*

*The TVA Bellefonte site meets the budget requirements. Over the life of the program more than 7B will be saved in federal resources on tax dollars. Some calculations say even as much as \$13B can be saved.*

JYLES MACHEN  
1515 LOCUST CIR SE  
HUNTSVILLE, AL 35801  
(205) 536-4459

1/07.03

Commentor No. 66: Bill Metchnik

October 6, 1998

**Bill Metchnik - Resident of Paint Rock, Alabama, Jackson County, Union Representative for this area.**

I rise as a citizen of Jackson County who resides in the town of Paint Rock, and who happens to be the Machinist Representative for all of North Alabama. As both a citizen and Union Representative, I do have a two-fold purpose to rise in support that the decision should be made that Tritium be manufactured at the Bellefonte TVA facility.

Understanding first of the economic boom where it would provide jobs, but jobs of a good paying nature for citizens not only for Paint Rock, Alabama, but for all the general area which can and will reach by such decision, and these jobs will be good union paying jobs.

As Union Representative, of course, the Union that I represent will be supplying people for jobs.

The studies that I have looked at clearly convinced me that the safety factor is so conclusive, and it should assure all, that <sup>there</sup> ~~this~~ is no danger to people who would work the jobs and again that environmental factor or impact to the area will not be compromised.

And last, when you look at the comparable cost to me as a tax payer, my taxes and yours would be better spent to have the work done at Bellefonte.

1/07.03

Commentor No. 67: Don Nelms

*Plumbers & Steamfitters* LOCAL UNION NO. 498

OCT-06-98 02:25 PM FSS L.U. 498 1 205 547 6330 P.02

Phone:

(205) 546-6791

Fax:

(205) 547-6330

October 6, 1998

FAX TO: DEPARTMENT OF ENERGY

FROM: DON NELMS, BUSINESS MANAGER

I am Don Nelms, Business Manager, Plumbers and Steamfitters Local Union 498, representing over 500 pipefitters and their families in Northeast Alabama. I am here on their behalf in support of Department of Energy Tritium Plant at Bellefonte.

1/07.03

*Don Nelms*  
Business Manager  
Plumbers & Steamfitters Local 498

AFFILIATED: American Federation of Labor and Building and Construction Trades Department.

**Commentor No. 68: David Nicholas**

David L. Nicholas  
President, Board of Directors  
Rick Roden  
Executive Director



**SCOTTSBORO / JACKSON COUNTY**  
Chamber of Commerce

February 24, 1998

**BELLEFONTE POSITION STATEMENT**

Sirs:

I come before you today representing the Scottsboro-Jackson County Chamber of Commerce and four affiliated organizations: Leadership Jackson County, The 21<sup>st</sup> Century Council, Design Scottsboro and the Scottsboro Business Council. Over 500 of the most active and civic minded leaders of Jackson County are represented by the membership of these organizations.

The unanimous position of the leadership of these bodies is to strongly endorse the completion and operation of the Bellefonte Nuclear Project as a joint effort between the Tennessee Valley Authority and the Department of Energy. Furthermore, no opposition has been voiced by any of the general membership of these groups.

It is our position that the issue of whether or not a nuclear power plant should be located in Jackson County, Alabama was decided many years ago and that this is not an issue to be addressed during these proceedings. It is also our position that, given a choice, no one would choose to live in a world where nuclear arms exist, but again this is not the issue to be addressed during these proceedings. The Department of Energy has been given a mandate to provide a reliable source of tritium for the maintenance of our country's nuclear arsenal and that is simply a fact of life. We, the leadership of the Scottsboro-Jackson County Chamber of Commerce and its affiliated organizations

1/07.03

**Commentor No. 68: David Nicholas (Cont'd)**

David L. Nicholas  
President, Board of Directors  
Rick Roden  
Executive Director



**SCOTTSBORO / JACKSON COUNTY**  
Chamber of Commerce

believe that the Bellefonte facility is the single best choice to fill this need. Since the start of construction on the Bellefonte facility over 20 years ago, Jackson County has been subjected to the devastating economic effects of the on again-off again status of Bellefonte and TVA's inability to decide on a permanent course of action. The American taxpayers have seen a substantial amount of their tax dollars funneled into this project with absolutely no return from that investment. It is our belief that when this project began, TVA made a commitment to the taxpayers of Jackson County that they would build this plant and provide a substantial number of good paying, permanent jobs to this area. To the management of the Tennessee Valley Authority, we say it is time to make good on that commitment; it is time to honor your promise to those individuals who have borne the consequences of your indecision.

It is also time to act as good stewards of the resources of the taxpayers of this country. We believe that this proposed joint effort is the prudent course of action and we urge both the TVA and the Department of Energy to proceed with all due speed.

Signed:  
  
David Nicholas  
President  
Scottsboro-Jackson County Chamber of Commerce

1(cont'd)

**Commentor No. 69: Donald E. Olson**

**Commentor No. 70: Mayor Louis Price**



**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:**

Worked with TWA over six years  
TWA is a Quality / Safety conscious organization  
TWA has superior ratings by INPO and the NRC at all their nuclear sites  
Light Water Reactors are safe and a prudent way to produce electric power  
TWA is consistently ranked at the top of the nuclear industry  
We need tritium for the national defense  
I support the partnership between DOE and TWA at the Bellefonte nuclear site

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Donald E. Olson (optional)  
Organization: \_\_\_\_\_  
Address: 1601 Shawwood Oaks  
City: Decatur State: AL Zip Code: 35603  
Work phone: 256-729-4532 Home phone: 256-256-0511  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98

**CITY of SCOTTSBORO**



Gail Duffey, City Clerk  
Louis Price, Mayor



SCOTTSBORO, ALABAMA

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
ATTN: Mr. Stephen Sohinki  
P.O. Box 44539  
Washington, D.C. 20026-4539

Dear Mr. Sohinki:

From the very beginning of the discussions of the Bellefonte Nuclear Plant as a source of tritium for our national defense, the City Government of the City of Scottsboro, Alabama has been very supportive of this plan. Our council and the mayor have expressed this support by resolution as well as by public statements as a group and individually.

We continue to maintain a strong desire to see Bellefonte completed for the production of tritium, as well as for the production of much needed electric power. For the benefit of our nation, cost, and schedule wise, it makes sense to use the Commercial Light Water Reactor for this task. The City of Scottsboro stands ready to do whatever can be done to bring this project to completion.

Sincerely,

Louis Price  
Louis Price, Mayor  
City of Scottsboro

1/07.03

**Commentor No. 71: Michael D. Roberts**

AmSouth Bank Building / P. O. Box 1668 / Decatur, Alabama 35602 / (256) 353-9450 / FAX (256) 353-5982

February 25, 1998

Mr. Stephen Sohinki  
Director  
U. S. Department of Energy, Commercial  
Light Water Reactor Project Office  
P. O. Box 44539  
Washington, D. C. 20026-4539

Dear Mr. Sohinki:

I am the Executive Director of the North Alabama Industrial Development Association. Our primary mission is to assist communities in locating new industry for North Alabama.

I support the Jackson County leadership in their strong desire for DOE and TVA to partner and produce tritium at Bellefonte. This location offers proven technology, the quickest production and the lowest cost.

Jackson County and North Alabama will provide DOE and TVA with the necessary support required for this project.

Sincerely,

Michael D. Roberts  
Executive Director

1/07.03

**Commentor No. 72: R. Kent Ryan****COMMENT FORM**

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:** I AM EMPLOYED BY STONE & WEBSTER ENGINEERING CORPORATION AT THE TVA BADGLEY FERRY NUCLEAR PLANT AS SITE MANAGER. THE TVA NUCLEAR PROGRAM HAS BEEN PROVEN TO BE ONE OF THE SAFEST, QUALITY FOCUSED AND COST EFFECTIVE PROGRAMS IN THE COUNTRY. I FULLY ENDORSE THE PRODUCTION OF TRITIUM AT THE BELLEFONTE NUCLEAR FACILITY. TVA, ALONG WITH ITS CONTRACTING PARTNERS, CAN PROVIDE THE REQUIRED TECHNICAL, CONSTRUCTION, AND OPERATIONAL EXPERTISE TO COMPLETE AND OPERATE THE BELLEFONTE NUCLEAR PLANT IN A SAFE AND EFFICIENT MANNER.

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: R. KENT RYAN (optional)  
Organization: STONE & WEBSTER ENGINEERING CORPORATION  
Address: 1801 BLUE DR  
City: HUNTSVILLE AL State: AL Zip Code: 35803  
Work phone: 256-729-2805 Home phone: 256-729-860-9936  
Fax: 256-729-4968  
E-Mail Address: r.kryan5@tva.gov



**Commentor No. 73: Steve C. Stutts**



STEVE C. STUTTS  
INTERNATIONAL REPRESENTATIVE  
INTERNATIONAL UNION OF OPERATING ENGINEERS  
AFL-CIO

25 TWELVE OAK CIRCLE  
SUITE D  
JACKSON, MISS. 39209

PHONE: 601 922 6844

**INTRODUCTION**

**WHO ARE YOU.**

**WHO YOU REPRESENT.**

Bellefonte should be selected as the primary tritium production source by the Department of Energy (DOE) to meet our national defense needs. We fully support the selection of Bellefonte based on the following reasons:

- IT IS A PROVEN TECHNOLOGY THAT IS SAFE AND ENVIRONMENTALLY FRIENDLY

The accelerator, at best, is a science project since no accelerator of this size has been built and operated before. The proposed accelerator is two orders of magnitude greater than existing research accelerators. Bellefonte is proven technology that will be safely operated on a daily basis by the Tennessee Valley Authority (TVA). TVA currently safely operates five reactors in the Valley on a daily basis.

- MEETS DEPARTMENT OF DEFENSE (DOD) REQUIREMENTS FOR THE NATIONAL DEFENSE

TVA could begin supplying tritium in 2005 as mandated by executive order. The accelerator would not be able to supply tritium until 2008 if everything went according to plan.

- ACCORDING TO CONGRESSIONAL BUDGET OFFICE REPORT, THE BELLEFONTE OPTION COSTS \$13 BILLION LESS THAN THE ACCELERATOR OPTION.

1/07.01

**Commentor No. 73: Steve C. Stutts (Cont'd)**

*In current dollars*, the accelerator would cost \$16 billion while the Bellefonte option would cost \$3 billion.

*In constant dollars*, the accelerator option would cost the taxpayers anywhere from \$9.5 to \$16 billion, plus approximately \$155 million each year to operate, while the Bellefonte option would cost the taxpayers a total of \$2.5 billion.

The money spent by DOE to complete Bellefonte would be repaid to the federal government. Revenues from the sale of electricity will be paid to DOE over the 40-year life of the plant to pay off the investment with interest.

**There would be no net loss of revenue to the government and taxpayers.**

- CREATES 800 PERMANENT JOBS AND HUNDREDS MORE INDIRECT JOBS. THAT'S NOT INCLUDING THE ADDITIONAL CONSTRUCTION JOBS AT THE PLANT.  
This is a significant socio-economic impact on northeast Alabama that must be strongly considered.

In closing, I understand that an Interagency Report by the DOE, DOD, National Security Council, State Department, Arms Control and Disarmament Agency, White House Office of Science and Technology Policy, Office of the Vice President, and the Nuclear Regulatory Commission has concluded that no domestic law or international treaty would be violated by producing tritium at Bellefonte; that use of Bellefonte extends the past practice of using government-owned facilities simultaneously for civil and military purposes rather than setting a new precedent for proliferation; and that DOE should continue to pursue the CLWR option given the essential defense need for tritium and the flexibility, technical maturity, and cost-effectiveness of this operation. The Operating Engineers fully support the production of tritium at TVA's Bellefonte Nuclear Plant.

1(cont'd)

**Commentor No. 74: Mayor Peaches Thompson**

October 6, 1998

My name is Peaches Thompson, I am the Mayor of Gurley, Alabama. In 1985, which Bellefonte was at its peak, our low to moderate income of people was at 58 percent. In 1997, we ran another survey and the numbers jumped to 88 percent, and we feel like part of that was due to Bellefonte closing at that time.

Speaking on behalf of the 1500 residents of Gurley, we unanimously support a cooperative effort between DOE and TVA to complete the Bellefonte Nuclear Plant for the production of tritium.

The selection of Bellefonte offers:

1. an assured supply of tritium necessary to our national defense program,
2. at the least cost to the U.S. taxpayer,
3. and much needed employment to an economically depressed area of the United States.

We stand eager and ready to support DOE and TVA in the process of making a Bellefonte Tritium Production Facility a reality.

For the records, I would like to present to Mr. Moderator a written statement of our support.

THANK YOU.

1/07.03

**Commentor No. 75: Richard Ward**

GOOD EVENING, MY NAME IS RICHARD WARD, GENERAL ORGANIZER, REPRESENTING THE INTERNATIONAL ASSOCIATION OF BRIDGE STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS AND AN ACTIVE MEMBER OF THE TENNESSEE VALLEY TRADES AND LABOR COUNCIL, WHICH IS COMPRISED OF 15 INTERNATIONAL TRADES AND LABOR ORGANIZATIONS.

SPEAKING ON BEHALF OF THE IRON WORKERS INTERNATIONAL ASSOCIATION, WE WHOLEHEARTEDLY PLEDGE OUR SUPPORT TO THE DEPARTMENT OF ENERGY AND THE TENNESSEE VALLEY AUTHORITY FOR THE COMPLETION OF THE BELLEFONTE PROJECT AS A TRITIUM PRODUCTION FACILITY IN SUPPORT OF OUR NATIONAL DEFENSE.

OUR MEMBERS AND FAMILIES, AS WELL AS THE COMMUNITIES IN THE SOUTHEASTERN UNITED STATES, ARE IN STRONG SUPPORT OF NATIONAL DEFENSE EFFORTS THAT KEEP THIS COUNTRY SAFE AND SECURE.

WE HAVE BEEN BRIEFED ON THE RESULTS OF THE RECENTLY RELEASED GOVERNMENT-PREPARED ENVIRONMENTAL IMPACT STATEMENT, AND WE FIND TRITIUM PRODUCTION WITH THE BELLEFONTE REACTOR TO BE ENVIRONMENTALLY SAFE AND ECONOMICALLY SOUND.

WE HAVE CAREFULLY ANALYZED THE CONGRESSIONAL BUDGET OFFICE COST COMPARISON OF THE TRITIUM PRODUCTION ALTERNATIVES AND IT MAKES NO SENSE WHATSOEVER TO CONSIDER ANY OTHER FACILITY OTHER THAN THE BELLEFONTE REACTOR TO PRODUCE TRITIUM.

I URGE THE DEPARTMENT OF ENERGY TO SELECT THE BELLEFONTE NUCLEAR PLANT AS THE PRIMARY SOURCE OF TRITIUM PRODUCTION.

THAT SELECTION WILL PROMOTE A COOPERATIVE EFFORT BETWEEN ORGANIZED LABOR, THE TENNESSEE VALLEY AUTHORITY AND THE DEPARTMENT OF ENERGY THAT WILL SAVE THE TAX PAYER BILLIONS OF DOLLARS.

MR MODERATOR, I WOULD LIKE TO PRESENT YOU WITH A COPY OF MY STATEMENT FOR THE RECORD.

THANK YOU.

1/07.03

Commentor No. 76: Dan Williams



*North Alabama Mayor's Association*

October 5, 1998

I am speaking on behalf of the North Alabama Mayors Association. The North Alabama Mayors Association represents the interest of one hundred eighty municipalities in the North Alabama area.

The North Alabama Mayors Association agrees with those who have reviewed the draft Environmental Impact Statement (EIS) for the production of tritium in a Commercial Light Water Reactor (CLWR) dated August, 1998. We find the proposed tritium production program to be environmentally safe and to produce no measurable health effects. In addition, we conclude that Bellefonte Nuclear Plant should be named in the EIS as the preferred alternative based on its least life cycle cost to the U. S. Taxpayer and the positive socioeconomic effects of the project. I am including a summary of the primary points from the Draft EIS used to reach this conclusion.

I appreciate the opportunity to tell you that the North Alabama Mayors Association supports wholeheartedly the production of tritium at the Bellefonte Nuclear Plant.

*Dan Williams*

Dan Williams  
President, North Alabama  
Mayors Association

P.O. Box 308 Huntsville, Alabama 35804  
(205) 538-7304 • Fax (205) 538-7525

Commentor No. 76: Dan Williams (Cont'd)

**DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

**USES OF TRITIUM**

Tritium is a radioactive isotope of hydrogen. If not properly controlled it can be dangerous, but when controlled properly is safe and can save lives. Tritium is:

- Used for life science and drug metabolism studies to ensure the safety of potential new drugs
- Used for self-luminous aircraft and commercial exit signs
- Used for luminous dials, gauges and wrist watches
- Used to produce luminous paint
- Used in Doppler Radar
- Used as a triggering component (i.e., boosts yield) in nuclear weapons

**NONPROLIFERATION ISSUES**

(Nonproliferation is defined as preventing the increase or spread of nuclear weapons)

Interagency Review of Nonproliferation Implications concerning tritium production was completed on July 14, 1998 and concluded the following:

- Nonproliferation policy issues associated with a Commercial Light Water Reactor (CLWR) are manageable and DOE should continue to pursue the CLWR option.
- No legal or treaty prohibitions against tritium production in a CLWR.
- Many exceptions have been made over the years to separation of civilian and military use of nuclear energy.
- Reactors producing tritium can remain on IAEA Safeguards List.
- No bilateral "peaceful uses" agreements will be violated. Reactors making tritium will use U.S. - origin uranium fuel.
- TVA's charter gives it a national security responsibility.

A House of Representatives Task Force (chaired by Lindsey Graham of South Carolina) issued a report to the Speaker of the House in 1995 concluding:

- Production of tritium in a commercial reactor is not a proliferation concern.
- Producing tritium in a reactor is no different than producing tritium in an accelerator.
- Raising nonproliferation concerns is simply an argument to sell the accelerator option.

Bellefonte would be operated as a electrical power generation facility with the ability to provide DOE with irradiation services for tritium production.

1/07.03

Comment Documents

**Commentor No. 76: Dan Williams (Cont'd)**

**ISSUES REVIEWED BY EIS**

- Land use
- Visual Resources
- Air Quality
- Water Quality and Use
- Archeological and historic resources
- Biotic (living things) resources including threatened and endangered species
- Socioeconomics (interaction of social and economic factors)
- Public and Worker Health and Safety

**ENVIRONMENTAL IMPACTS OF OPERATION OF BELLEFONTE REACTORS**

- EIS verifies that the incremental impacts of producing tritium in a commercial reactor are small with no measurable health effects.
- No air quality standards will be exceeded.
- No impacts to threatened or endangered species are expected.
- There will be a visual impact from the cooling tower vapor plume.
- Minimal impact on Guntersville Reservoir (0.2% of the flow).
- Minor impacts to aquatic resources from impingement in cooling water intake screens.
- Positive socioeconomic impacts
  - 800 Bellefonte workers
  - Up to 800 indirect jobs
  - Unemployment rate would stabilize approximately 2 % below current levels.

**RADIATION EXPOSURE**

**SOURCES OF PUBLIC RADIATION EXPOSURE**

- Natural Radon - 200 millirems per year
- Cosmic Radiation - 28 millirems per year
- Terrestrial - 28 millirems per year
- Internal (your own body)- 39 millirems per year
- Medical X-Ray - 39 millirems each time
- Nuclear Medicine - 14 millirems each use
- Drinking Well Water - 1 to 6 millirems per year
- 5 Hour Airplane Flight - 2.5 millirems
- Eating Food Grown with Phosphate Fertilizers - 1 to 2 millirems per year
- Wearing porcelain dental crowns or dentures - 0.7 millirems per year
- Bellefonte Reactor Operation with Tritium Production - 0.58 millirems per year
- Cooking with Natural Gas - 0.4 millirems per year
- Bellefonte Reactor Operation - 0.26 millirems per year

**Commentor No. 76: Dan Williams (Cont'd)**

**PUBLIC RADIATION EXPOSURE COMPARISON**

- Average U.S. resident (Background) - 363 millirems per year
- Resident of Denver, Colorado (Background) - 442 millirems per year
- Resident of Jackson County, AL (Background) - 355 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation) - 355.26 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation with Tritium Production) - 355.58 millirems per year

**CONCLUSION: BELLEFONTE SHOULD BE THE PREFERRED ALTERNATIVE!**

The draft CLWR EIS does not identify a preferred alternative for producing tritium. A no action alternative is for DOE to build an accelerator in South Carolina. After reviewing the draft EIS and comparing the potential impacts associated with the alternatives, including the no action alternative, we believe that the preferred alternative should be identified as any alternative that includes Bellefonte. This belief is based on the following:

- Negligible environmental impacts with no measurable health effects.
- Positive socioeconomic impacts supporting economic growth and development
- Flexible tritium production capacity to meet changing tritium needs
- Proven technology compared to the No Action alternative
- No proliferation issues that are not manageable under existing laws and controls associated with CLWRs
- Least Total Life Cycle Cost

**Commentor No. 77: Danny L. Williams**

**October 6, 1998**

**My name is Danny L. Williams, Business Manager of the International Union of Operating Engineers, Local 320, Florence, Alabama.**

Speaking on behalf of the 590 members, we unanimously support a cooperative effort between the Department of Energy and the Tennessee Valley Authority to complete the Bellefonte Nuclear Plant for the production of tritium.

The selection of Bellefonte offers:

1. an assured supply of tritium necessary to our national defense program,
2. at the least cost to the U.S. taxpayer,
3. and much needed employment to an economically depressed area of the United States.

We stand eager and ready to support DOE and TVA in the process of making a Bellefonte Tritium Production Facility a reality.

For the records, I would like to present to Mr. Moderator a written statement of our support.

THANK YOU.

1/07.03

**Commentor No. 78: David Thornell**

Burn Lowelady, Chairman  
Debra Jordan, Vice-Chairman  
Wade "Bo" Murray, Treasurer  
Jim Green, Secretary  
Tommy Harding, Director  
James V. Hastings, Director  
Gary Lackey, Director



David Thornell, CEO,  
Executive Director  
  
Shelia Bryant,  
Assistant Director

**Jackson County Economic Development Authority  
Supports Tritium Production at Bellefonte**

The lead economic/industrial development marketing and recruitment agency for Jackson County gives their enthusiastic endorsement for the production of tritium at the TVA-Bellefonte facility.

We feel that the selection of Bellefonte by the DOE to serve this nation's tritium needs represents a win-win situation for our county and this country. It is the clear winner and perhaps the best deal that the United States will ever have available from an investment standpoint. The shared power revenues as proposed will more than pay back all expenditures and the production of tritium in a light water reactor is the only proven method under consideration. We have learned a lot about this process through this selection phase. We have read the Environmental Impact Documents. We believe it is and will be safe. Without this knowledge we would be firm in opposing this project. However, based on the facts, Jackson County offers an operating environment that will be overwhelming in its support. This is true from our first-hand view and involvement and as indicated by these local public hearings. We want the jobs, we want the dollars and we want to support our nation's security interests by joining DOE and TVA in a partnership that will accomplish these common and vitally important objectives. Bellefonte is the wise choice and therefore the best choice.

1/07.03

Commentor No. 79: Anonymous (3)**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: We are for tritium production at Beaverton plant

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: \_\_\_\_\_ (optional)  
 Organization: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
 Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/96

Commentor No. 80: Anonymous (4)**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: We are totally opposed to the proposal for environmental and other safety concerns (terrorism is a reality in our world today - this reactor most likely would be a prime target). Also... accidents do happen and even a small percentage of a chance of one occurring is far too risky considering the magnitude of a nuclear disaster.

1/14.04

2/22.01

3/15.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Commentor No. 81: Melvin L. Brewer

**IRON WORKERS LOCAL UNION NO. 704**

INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS

2715 BELLE ARBOR AVENUE

CHATTANOOGA, TENNESSEE 37406

MELVIN L. BREWER  
Business Manager

423 / 622-2111

FAX 423 / 622-2112



Good Evening,

I am Melvin Brewer, Business Manager of Local 704 of the International Association of Bridge, Structural, Ornamental and Reinforcing Ironworkers from Chattanooga, TN.

On behalf of our 600 plus members, I would like to voice our support for the proposed Commercial Light Water Reactor for the production of Tritium Gas at Bellefonte with Watts Bar and Sequoyah as a back-up.

The reasons for our support are numerous and are beneficial not only to the people of this area, but to the American people as a whole.

Some of the reasons are

Savannah River Site does not meet the 2005 production of tritium mandated by the President and Congress.

Accelerator Production of tritium requires a 500MW power source for operation. Bellefont will actual produce power.

As for the safety of the plant, TVA has an excellent record. Accident risk for Bellefonte is one fatal cancel every 245 million years and transportation risk is less than one fatal cancer per 100,000 years. The risks factor for Watts Bar and Sequoyah are quite a bit less.

Additional low-level waste is about 1% of TVA current volume.

While the accelerator is an un-proven method, Commercial light water method has been proved at Watts Bar. With Watts Bar and Sequoyah has a back-up this plan will insure the country's supply of tritium for it's National Defense needs.

As Tritium production in a commercial reactor is not prohibited by International nor the United States law. We feel like the benefits out weight the risk.

1/07.01

Commentor No. 82: Danny M. Easter



**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I AM IN SUPPORT OF THE CLWR PROJECT BECAUSE OF OUR NATIONAL SECURITY & THE LEAST EXPENSE TO THE AVERAGE TAXPAYER.

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Danny M. Easter (optional)  
Organization: Primer's Law 206 Challe  
Address: P.O. Box 947  
City: Rockwood State: Tenn Zip Code: 37854  
Work phone: 423-365-3133 Home phone: 423-365-4651  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98

Commentor No. 83: Ronald E. Easter**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I SUPPORT CHWR BECAUSE  
IT IS THE CHEAPEST WAY TO PRODUCE  
TRITIUM FOR OUR NATION'S DEFENSE.

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Ronald E. Easter (optional)  
Organization: Parents 1,026 Chatt.  
Address: ~~447 E. 1st St.~~ P.O. Box 942  
City: Rockwood State: Tn Zip Code: 32854  
Work phone: 678-4162 Home phone: 354-1134  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98

Commentor No. 84: Linda Ewald**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I ~~was~~ <sup>am</sup> opposed to the production of tritium because  
of the increased risk of environmental contamination,  
increased hazard to human health, increase production of  
nuclear waste (when we don't know what to do with  
current waste), the financial costs, and the  
immorality of its use in nuclear weapons.

The United States does not need tritium by  
the year 2005. By DOE's calculations the U.S. can  
maintain its current huge ~~size~~ arsenal without  
producing tritium until 2016. And if the arsenal is  
reduced as experts claim it can and should be, no  
new tritium would be needed until 2026.

Tritium decays at the rate of more than 5% per  
year - if production begins by 2005 - half will be  
gone by the time it is actually used. It will cost  
at least 2 billion dollars (and in reality probably much  
more) to begin production of tritium. That money  
is wasted - 2 billion Federal dollars could create  
26,000 valuable jobs.

But most of all, the production of nuclear weapons  
materials in a civilian reactor is immoral and a  
violation of the nuclear non-proliferation treaty signed  
and ratified by the United States in 1970. It is

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Linda Ewald (optional)  
Organization: Foundation for Global Sustainability, Oak Ridge Environmental Policy  
Address: 649 Pender Road  
City: Knoxville State: TN Zip Code: 37943  
Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98



Commentor No. 84: Linda Ewald (Cont'd)

hypocrisy for us to criticize other nations for their use of commercial reactors to produce nuclear weapons material, while we make plans to produce tritium in our civilian reactors.

As a taxpayer and a human being, I do not want to support the production of tritium or any nuclear weapons material.

Weapons of mass destruction threaten all of Creation.

This plan sets a precedent that will destroy our international non-proliferation efforts. I urge the individuals with the power to make decisions to consider the long term consequences. Is short term gain worth the risk to our health, our home and our future?

Thank-you for the opportunity to comment.

7(cont'd)

Commentor No. 85: William Griffith



**Stone & Webster**

FOUNDED  
1889

**STATEMENT FROM STONE & WEBSTER**

My name is William (Bill) Griffith. I am a Vice President with Stone & Webster Engineering Corporation. We are now the Engineers of Record for the Bellefonte nuclear plant. We are one of the world's largest engineers and constructors of commercial nuclear facilities. We have reviewed the Draft Environmental Impact Statement and would like to compliment the Department of Energy on the thoroughness of that report. And we agree with the conclusions as stated both from a safety perspective and from the impact on the environment. We as the engineers, through our engineering and design responsibilities, will ensure that the Bellefonte nuclear power station is designed in compliance with all applicable laws and environmental regulations.

1/07.03

###

10/8/98

**Stone & Webster, Incorporated**  
P.O. Box 2325, Boston, Massachusetts 02107-2325  
245 Summer Street, Boston, Massachusetts 02210  
Tel: 617-589-5111 Fax: 617-589-2158

**Commentor No. 86: Ann Harris**

Ann Harris  
305 Pickel Road  
Ten Mile, TN 37880

phone # 423-376-4851  
Fax # 423-376-8864  
e-mail: apickel@aol.com

October 8, 1998

Comments to DRAFT EIS on TRITIUM production using the commercial light water reactors @ TVA:

1. Decommissioning of a TRITIUM production site has never been performed therefore who is going to clean up the mess left at Watts Bar when DOE and DOD leave? The cost will be much higher at a tritium production plant than at a plant not making tritium. Will the rate payers of TVA have that added to their stranded cost when deregulation hits?

1/20.01

2. I could not find the definitions for such words as –

--“measurable health effects”

2/14.11

--“associated impacts of transporting “

3/18.02

--previous (TVA) impact statements—: “serve to a great extent as the basis for this EIS”

---Does it mean that DOE went back into history and found something they liked and used it ----that is what appears to have happened here. Watts Bar was licensed 3(three) years ago----Sequoyah over 15 and Bellefonte does not have one that is in this decade. So what is the basis for making that statement. What is the NRC basing their decision of NO Significant Impact!

4/05.25

---What does No Significant Impact mean? Does that mean that the local people are of no significance, the country surrounding Watts Bar or the river is of no significance? Some where you must define how you use the word “significant” and how it applies to this EIS.

5/05.28

----TVA and the NRC both use the word significant until an action happens that makes people scream “Uncle”. So I am asking what DOE’s usage is in this format?

3. You have used the national average of fuel rod burns to set the standard in this EIS. Why didn’t you use TVA’s average of burns. Is it because the average is much higher than 2 (two) per year. Using competent and safe nuclear programs around the nation does not reflect TVA’s record.

6/19.06

4. What is the basis for using INPO’s reports to defend using TVA’s CLWRs when the public does not have access to those reports and cannot get them? (The NRC and TVA both use INPO documents to make critical judgments that best suit them to write violations against TVA and TVA does not produce ALL of INPO’s comments when talking to the public. Therefore the public is at a vast disadvantage responding to this EIS on that basis alone)

7/09.05

**Commentor No. 86: Ann Harris (Cont’d)**

page 2

ann harris

10-8-98 comments

5. You used the “affected environment area” terminology at the Bellefonte Meeting. Does that mean that you base that on the “current prevailing winds?”

8/14.12

6. What is the current waste water program that the TVA nuclear programs use to clean up the reactor coolant waste water prior to release into the Tennessee river? Where is the procedure for that and how often is that program tested to support its reliability? What is the criteria that the NRC will use to monitor that program? Where is that criteria located now?

9/11.01

7. At the Bellefonte it was stated that if TVA has an over run of the bid that TVA will pick up the overrun; i.e. the rate payers. Does the 1.9Billion dollars that using the CLWRs at TVA also include the cost of transportation to the SRS and does it include the cost of the extraction facility? If not why not?

8. You have made the point several times that TVA is a government agency. If that is a matter of fact shouldn’t you notify the White House, congress, the media as well as the TVA Chairman and board in addition to the rate payers in the valley and notify them that TVA will be sharing the cost of mismanagement and illegal activities with all of the taxpayers across America. Also you state that TVA’s reactors are government owned. When did the rate payers sell off the assets of the valley? What is the basis for these statements and why was this language used? TVA has never been known in the past as a government agency. Doe is taking the position that DOE only has to come in and confiscate TVA!

10/23.14

9. In your draft you report very small numbers of abused employees that have been harmed as a result of raising safety issues. Are those numbers from the Department of Labor or is that from the thugs at Region II of the NRC or is that from the TVA Nuclear’s Vice President that says that the NRC---DOE----DOL----the media---- or the public does not know the law and that TVA has never abused any one over safety issues.

11/09.06

10. How will TVA-----the NRC-----and DOE ensure a safety conscious work environment where employees feel free to raise safety issues with out damage to them , their families or their careers? When a TVA employee receives a death threat at his/her work desk since 1995 up and through out the past month then safety is not a top priority of these agencies. Where is my confidence that you are willing to protect workers from management abuse?

**Commentor No. 86: Ann Harris (Cont'd)**

Page 3  
ann harris  
10-8-98 comments

11. Will DOE pay replacement cost for damage to private when the accident happens? (since the Price Anderson Act only requires that an insurance company to pay a set amount for damage to private property.) How will you reimburse me for your recklessness?

12/15.01

12. At the Bellefonte meeting you stated that you will be using Watts Bar, Sequoyah and in addition to Bellefonte to keep up the production on an annual rotation. What is the basis for this menage a trois with DOE? Also where in the EIS is that scenario addressed?

13/03.03

I have additional comments but will seek that they be addressed through further written comments.

**Commentor No. 87: Jerry V. Mills**



**COMMENT FORM**

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- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I support tritium production at the TVA Nuclear facilities. I am an Engineer currently working at Sequoyah Nuclear Plant with 20 yrs experience in the nuclear industry. I worked 8 yrs on the Bellefonte design (secondary side of the plant - power producing side). The design of the secondary side of the plant for exceed the code requirements with respect to material certification & quality. I was part of 2 major walkdowns of the secondary side of the plant in the early 1990's. All of the major equipment and piping is installed. Only small pipe piping & miss drains & vents was not completed. Like Watts Bar, Braidwood & Sequoyah the thermal efficiency of the plant (heat cycle efficiency) will be among the best in the country. With the growing concern over air quality, producing Bellefonte can help reduce greenhouse emissions from such fuels.*

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Jerry V. Mills (optional)  
Organization: Nuclear Engineering, Sequoyah Nuclear Plant  
Address: 512 New Union Circle  
City: Dayton State: TN Zip Code: 37321  
Work phone: (423) 843-8339 Home phone: (423) 725-5250  
Fax:  
E-Mail Address: JVMills@TVA.gov

7/4/98



## COMMENT FORM

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I am in support of the CLWR. We need the tritium for the protection of our nation and the people are already in a huge savings for tax payers.*

1/07.01

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Jesse L. Reed (optional)  
 Organization: Ironworkers Local 724 Chattanooga  
 Address: 2427 Warren Memorial Highway  
 City: Chattanooga State: Tenn. Zip Code: 37327  
 Work phone: \_\_\_\_\_ Home phone: (423) 265-6669  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

## Commentor No. 89: Steve Tanner

October 8, 1998

U.S. Department of Energy  
 Commercial Light Water Reactor Project Office  
 P. O. Box 44539  
 Washington, DC 20026-4539

Dear Mr. Sohinki:

I have the following comments on the Draft Environmental Impact Statement (DOE/EIS-0288D) for the Production of Tritium in a Commercial Light Water Reactor.

1. Summary - Section S.1.1 after last sentence add the same last sentence as Volume 1 section 1.1.1 which states: "DOE is considering only the purchase of irradiation services, not the purchase of a reactor." 1/24.12
2. Volume 1, Section 1.3.5 - Add reference to Speaker's Task Force on Nuclear Cleanup and Tritium Production. A Report titled: "Getting on with Tritium Production: A Report to Speaker Newt Gingrich" dated September 29, 1995. Reason for my comment is that this report also concluded there were no treaties, laws, or policies violated with CLWR tritium production. 2/01.04
3. Volume 1 Section 5.2.11 - Construction Impacts (regarding Accelerator) - I do not believe the most significant impact regarding dewatering has been captured.

The current wording in the Draft CLWR EIS Section 5.2.11 currently states that impacts would be minimal, but there is no mention of the groundwater being contaminated. The APT Draft EIS, Section 3.3.2.2 identifies that radiological analysis of groundwater from the water table showed that radium and tritium are present in some locations beneath the preferred site and are slightly above the respective drinking water standards.

4. Under ERP No. D-DOE-A09828-00 Rating EC2, Surplus Plutonium Disposition (DOE/EIS-0283) for Siting, Construction and Operation of three facilities for Plutonium Disposition the EPA expressed concern as to the *lack of assurance that proposed operations would not lead to further adverse impacts*. 3/04.05

Draft CLWR EIS, Section 5.2.11, subsection on Operational Impacts states that the APT would produce neutrons which have the potential to penetrate the shielding and be absorbed by the soil and groundwater. This indicates that there **would be adverse impacts from operations** of the facility and that the EPA concerns under the plutonium disposition EIS are valid and should therefore also be addressed for the APT. I am not suggesting that all of the APT Impacts be addressed in the CLWR EIS. I do believe though that the most significant ones should be mentioned in the CLWR EIS since the APT is the no action alternative. If this area is not yet addressed in the

**Commentor No. 89: Steve Tanner (Cont'd)**

APT EIS, it would not be appropriate to address it in the CLWR EIS until the APT EIS has evaluated the issue. || 3(cont'd)

Sincerely,

*Steve*

Steve Tanner  
2475 Allegheny Dr.  
Chattanooga, TN 37421

**Commentor No. 89: Steve Tanner (Cont'd)**

**FR-ENVIRONMENTAL SCAN: 09/25/98**

RA Web Page: <http://insidenet.tva.gov/envmat/rcpaff/ra.htm>  
For full text or "pdf" format: <http://insidenet.tva.gov/envmat/rcpaff/fedrep/erp092598.htm>

Index of Items: (09/25/98 Total 2)

1. EPA—Environmental Impact Statements and Regulations; Availability of EPA Comments
2. EPA—Common Sense Initiative Council, (CSIC)

-----No. 1 of 2-----

L-S ID No. : 645207 (72 lines)

PAGE: 63 FR 51349 NO. 186 09/25/98

CFR: -NONE-

CAPTION: Environmental Impact Statements and Regulations; Availability of EPA Comments

AGENCY: Office of Federal Activities  
Office for Enforcement

Environmental Protection Agency

ACTION: Notice

CONTACT: Office of Federal Activities, 202-564-5076

SUMMARY: ERP No. D-DOE-A09828-00 Rating EC2, Surplus Plutonium Disposition (DOE/EIS-

Page 1

0283) for Siting, Construction and Operation of three facilities for Plutonium Disposition, Possible Sites Hanford, Idaho National Engineering and Environmental Laboratory, Pantex Plant and Savannah River, CA, ID, NM, SC, TX and WA. Summary: EPA expressed environmental concern based on the effects on water and ecological resources and the presence of contamination in the existing environment and lack of assurance that the proposed operations would not lead to further adverse impacts.

**Commentor No. 90: Steve Tanner**

Good Evening, My name is Steve Tanner. I have over twenty six years experience in the nuclear and defense industries. I am an employee of TVA. I am here tonight though not as a TVA employee, but as an interested citizen and concerned taxpayer of the United States of America. The views and beliefs I express to you tonight are my own.

For over two years now, I have had the opportunity to gain a tremendous amount knowledge regarding DOE's efforts to obtain a new assured supply of tritium. I have researched information regarding what tritium is, the associated health effects, why the United States needs tritium, what has been occurring in congress and in DOE since 1989 pertaining to tritium production, what other nations are doing about tritium production, what the United States policies are regarding proliferation, arms reduction, science and technology, and how our political process is working just to name of few. I have also reviewed and compared data provided in the draft EIS's for both the CLWR and the APT options. I would be afraid to even try to estimate the volume of material I have seen and read regarding tritium.

Let me start by commending DOE and TVA for their thoroughness and depth in the draft Environmental Impact Statement for the CLWR production of tritium. I truly believe that all potential impacts have been identified and thoroughly evaluated.

~~Next~~  
~~Now~~, I would like to share with you a few things that I have learned through my research regarding the No Action Alternative:

The first thing I learned involves time and money:

DOE has been attempting to provide an assured supply of tritium to meet defense needs for at least ten years now. In March 1989, a report was prepared identifying that an Accelerator for the production of tritium could be designed and built in Hanford, Washington at a cost of \$2.3 Billion in 9 years.

Today, over nine years later, 3 years into conceptual and detailed design activities, after numerous studies and some limited testing and who knows at what cost to date, the estimate is even higher. There is still \$3.5 Billion to go to get an accelerator facility built and operating,

1/23.15

**Commentor No. 90: Steve Tanner (Cont'd)**

40 years of operations and maintenance cost, nine more years to go on the schedule, and not in Washington State but now in South Carolina.

What this indicates to me is that we have people in this country that have found their answer to our ailing Social Security Program --- they have found a way to fund their own retirements through a pork barrel program called the Accelerator Production of Tritium---and it's being paid for through our tax dollars.

The second thing I learned deals with political interference:

Congress has each year, I know since 1993, passed laws that required DOE to find a solution and make a decision regarding a source of tritium. In fact, in November 1993, congress passed the FY94 Defense Authorization Act which required DOE to evaluate the commercial production of tritium. Then a law was passed that specifically required any new tritium production facility to be built in South Carolina. Why South Carolina? Politics!

In 1995, DOE's dual path strategy using an accelerator or a CLWR was published after the urging of congress for DOE to again consider commercial production. Congress recognized in public law the dual path strategy and mandated a decision date by DOE.

Since then a political battle has been occurring. This battle has been Accelerator pork barrel benefactors against those that are serious about what is best for our country. Fortunately, we have some very strong and capable congressional members that have maintained DOE down a steady path of finding what is best for the United States and who support the decision being made by DOE based on merit not politics.

I believe that DOE can and will make a decision based on what is best for the United States as long as the pork barrel politicians stay out of their way.

1(cont'd)

2/01.02

Commentor No. 90: Steve Tanner (Cont'd)

The third thing I learned also involves political interference but is more specific to so called proliferation implications:

Who's to say what we as a country can achieve regarding arms reduction and control. I have seen some major shifts in our policy as a nation. Moving more and more towards being the leader in nuclear weapons reductions. The United States has been a leader in the development of the Comprehensive Test Ban Treaty, the Non-proliferation Treaty, and is currently leading the world towards adopting a Fissile Materials Cut-off Treaty.

Yet while we move forward towards these goals, let us not forget that to lead we must take the right actions. I know that until we achieve total world nuclear disarmament the right action is for the United States to maintain a nuclear deterrent. I also know that to maintain that deterrent safe and reliable we need tritium.

I believe to build an accelerator as a "New Nuclear Defense Production Facility" as part of the Nuclear Weapons Complex is not the right action. I state this because a new accelerator facility built with a mission of tritium production, a facility capable of producing fissile material such as plutonium and uranium, a new production facility controlled by the Nuclear Weapons Complex and probably not subject to IAEA accountability inspections, a facility that uses a technology that is not under current export controls --- that all of these things indicate high risk and they carry major proliferation implications.

On the contrary, DOE's purchase of irradiation services through a financial arrangement with TVA which allows for completion of Bellefonte, is consistent with the direction our country has been going regarding other military versus civilian technology uses.

Let me share this with you: The United States National Security, Science and Technology Strategy states: "The Administration has launched initiatives that reflect new ways of doing business. Acquisition reform removes barriers that separate the defense industry from the commercial industry and thus ensures that the military acquires the highest quality equipment at the lowest cost. Our dual-use technology policy recognizes that our nation can no longer afford to

3/01.04

Commentor No. 90: Steve Tanner (Cont'd)

maintain two distinct industrial bases and allows our armed forces to exploit the rapid rate of innovation of commercial industry to meet defense needs."

3(cont'd)

So I believe as we lead the world to disarmament and to minimize any potential proliferation implications, building the accelerator is not the right action. I also believe the right action is to use a CLWR. I state this because use of a CLWR:

- supports our dual-use technology policy,
- does not violate any laws, treaties, or policies,
- Provides greater government control than the DOE Nuclear Weapons Complex which is managed by private sector Management and Operations companies under contract with DOE and in business for a profit while TVA reactors are managed and operated by government employees, and
- a CLWR would only be used to irradiate DOE components that produce tritium in a non-weapons usable form more like producing a raw material than the finished product in a TVA reactor.

4/07.01

In summary,

I recommend that DOE include as the preferred alternative to be identified in the Final CLWR EIS use of the Bellefonte facility with, when and if needed, a Watts Bar backup, and

5/06.05

I request that DOE move expeditiously to eliminate any further funding of the "Accelerator Production of Tritium Project" or as a minimum rename the project to the "~~Pork Barrel~~ - Fund Our Retirement Production of Tritium Project". Then when someone says they are F.O.R. APT, we'll know what they really mean.

6/04.01

I thank you for listening and submit a copy of my comments for the record and your consideration.

Comments of Steve Tanner at Public Meeting on Tritium Production in Commercial Light Water Reactors, October 8, 1998, Evansville, TN

Commentor No. 91: Charles R. Watson**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

There are several ways to provide comments on this document and these include:

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- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *It is a good safe way to make tritium gas, and we need the gas for power in the area*

1/07.02

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Charles R. Watson (optional)  
 Organization: Ranch L.V. 226  
 Address: 315 Jackson Ln  
 City: Clark, TN State: TN Zip Code: 37343  
 Work phone: \_\_\_\_\_ Home phone: 842-5240  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

7/4/98

Commentor No. 92: Marie Weir**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I am in favor of CLWR because I believe it is in the best interest of our country to be able to defend ourselves and to do this we must have the means of producing tritium. I also believe CLWR is the most economical way to produce tritium. The plants are already there, which is a huge savings to taxpayers in comparison to building a huge plant for that specific purpose. This is a two-fold savings for the plants also produce power at the same time. It is safe according to all studies conducted.*

1/07.02

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Marie Weir (optional)  
 Organization: \_\_\_\_\_  
 Address: 8507 Dayton Ave Hwy  
 City: Dayton State: TN Zip Code: 37321  
 Work phone: 698-463 Home phone: 775-0356  
 Fax: 698-4932  
 E-Mail Address: \_\_\_\_\_

7/4/98



**Commentor No. 93: Mitchell Weir**



**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

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- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/3p-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: *I am in favor of the CLWR process to produce tritium for the nation's stockpile. This option is the only one that does not suffer from the American taxpayer. The 9 billion dollar savings along with the slight impact the CLWR will make on the environment makes the choice very easy.*

1/07.02

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: *Mitchell Weir* (optional)  
 Organization: *Paintners & Wallace Trade S LU#226*  
 Address: *8507 Dayton Mt Hy*  
 City: *Dayton* State: *TN* Zip Code: *37321*  
 Work phone: *612-698-4163* Home phone: *423-9750356*  
 Fax: *612-698-4432*  
 E-Mail Address:

7/4/96

**Commentor No. 94: Oak Ridge Environmental Peace Alliance  
 Presented by Ralph Hutchison**

Comments on the  
 Draft Environmental Impact Statement  
 for Tritium Production  
 in a Commercial Light Water Reactor

by the  
 Oak Ridge Environmental Peace Alliance  
 October 8, 1998

**CHAPTER 1**

1.1.1 The document states that "the U.S. nuclear weapons complex does not have the capability to produce the amounts of tritium that will be required to support the Nation's current and future stockpile."

Comment: 1) The Nation is a magazine. The United States is a nation. 2) This statement is divorced from reality. The DEIS can reference the President's directive demanding more tritium, but as DOE well knows, its own numbers show we do not need tritium until 2016 (to maintain START 2 levels) and will by then likely need less tritium due to additional multilateral stockpile reductions. As NRDC has pointed out, a scenario of 1000 warheads—still more than enough to secure our national defense and serve as adequate a deterrent against hostile attack as any size arsenal—would not require additional tritium until 2032 (by that time, 3/4ths of any tritium produced in 2005 will have decayed away).

1/24.12

2/02.02

1.1.2 The DEIS envisions the life of the light water reactor being used to produce tritium to be 40 years.

Comment: In the case of Watts Bar and Sequoyah reactors, 40 years from 2005 would extend their life beyond current expectancy. In the case of Bellefonte, just a few years after the US would really "need" the tritium (2032 under the NRDC 1000 warhead scenario) the reactor would shut down.

3/21.03

1.1.4 The DEIS proposes to define the reasonable alternatives as the four reactors "offered" by TVA (Watts Bar 1, Sequoyah 1&2, Bellefonte 1), added Bellefonte 2 as "reasonable" and proposed to examine the environmental impacts of using any combination of the five. TVA has withdrawn three of those reactors from its offer (Watts Bar and the Sequoyahs), leaving DOE with only Bellefonte 1 as "offered."

Comment: In considering reasonable alternatives, DOE must use some criteria and use it consistently. Either only the reactors offered in response to the procurement process can be considered (and then only those which continue to be offered), or all reactors, completed and uncompleted, which could be used must be considered as reasonable alternatives. (This would conceivably include the Fast Flux Test Facility in Richland, Washington and any number of commercial reactors operated by public utilities). Either the realm of reasonable is defined by those "offered" or it is not. In either case, DOE's current list is not sufficient to define "reasonable" alternatives.

4/06.03

1.3.1 DOE describes the process by which the "required tritium requirements" (sic) are determined.

Comment: It is not clear from this description whether the date 2005 comes from the Presidential directive (where the President demonstrates the kind of clear thinking and good judgement that got him in his current mess, only this time on a subject far more serious) or from DOE's extrapolation from the Presidential directive. It should be made clear.

2(cont'd)

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

1.3.2. The DEIS: "In the absence of new weapons design and the total redesign of all warheads and delivery systems, the nation requires a reliable source of tritium to maintain a nuclear deterrent. Furthermore total redesign...would require nuclear testing which would be contrary to the President's pursuit of a Comprehensive Test Ban Treaty."

**Comment:** DOE demonstrates its selectivity in describing the context in which this "need" is being defined and this decision is being made. In imagining the possible future, it is more reasonable and just as accurate to say, "In the event of further arms reductions which would require accelerated dismantlement of the current nuclear arsenal, the nation's need for tritium to maintain its nuclear arsenal would decline along with the size of the arsenal, pushing the "need" date far into the future. This development would be in compliance with the nation's legal obligation to pursue complete disarmament under the Nuclear Nonproliferation Treaty, Article VI, which became the law of the United States upon its ratification in March, 1970. The DEIS should reflect reality—consideration of "reasonable alternatives" should not be bound by outdated policies, particularly those which have been denounced by no less eminent persons than General Lee Butler, retired head of the US Strategic Air Command and President Jimmy Carter. NEPA does not permit DOE to limit its "reasonable" alternatives to Presidential policy statements.

1.3.3 The DEIS says tritium "must be available" by 2005 if a commercial light water reactor is the source and that tritium "must be available" by 2007 in a linear accelerator is the source.

**Comment:** This discrepancy is not based on any science or fact. It gives the lie to DOE's statement of "need." If the "need" for tritium is based on decay of tritium in the current arsenal and the fixed amount available in the reserve, then we will "need" tritium when we need it and the date will be the same whether the source is commercial reactors, linear accelerators, or purchase from Canada.

1.3.5(2) The DEIS cites four instances of "exceptions to the practice of differentiating between US civilian and military facilities" in an effort to address proliferation concerns.

**Comment:** This attempt to skirt the significant concerns of the public (concerns shared by a large majority of the US House of Representatives) about the proliferation impacts of using a civilian nuclear reactor to produce bomb material is disingenuous, outrageous, and absurd.

Clearly the concern about nonproliferation which the US has used around the world has never been that a nation which possesses military nuclear facilities will surreptitiously use those facilities for peaceful purposes. It is disingenuous of the DEIS to pretend it misunderstood the public's concern. It is absurd to imagine we would threaten (or, as we ostensibly did in Iraq, attack) another nuclear power (Russia? Great Britain? China? France?) to prevent them from converting a military installation to a peaceful purpose, or to disable their efforts to use military technology for civilian purposes.

Give us a break! The concern has always been that nations would be able to disguise weapons development as civilian activity or transfer commercial expertise toward the development of weapons of mass destruction. It is this activity we forbid in other nations (North Korea, Iran, Iraq, etc.) And it is precisely this activity we propose to undertake in this DEIS.

If, in fact, section 1.3.5 represents the best defense of the Interagency Review, then one of two things is true: either 1) the interagency review was bound by a predetermined outcome and had to perform these gymnastics of logic to attempt to perform its assignment satisfactorily or 2) the interagency review group was astonishingly inept.

1.3.5(3) The DEIS says any reactors used to produce tritium would "remain eligible for IAEA safeguards."

**Comment:** What are these safeguards? Is DOE saying the reactors would be placed under IAEA safeguard, or is DOE only being coy? Has IAEA agreed it would accept the responsibility of "safeguarding" these reactors? (This is not a silly question. In 1994, when DOE brought

5/02.01

2(cont'd)

6/01.04

7/01.06

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

highly "enriched uranium to the US from Kazakhstan, it announced loudly that the material would be placed under IAEA safeguards at Y-12 in Oak Ridge. This never happened because IAEA balked at the responsibility, apparently for two reasons: lack of resource to do the job, the fact that IAEA could not reasonably verify the contents of the cans and therefore declined to be responsible for them.)

1.3.5(3) The DEIS says the fact that TVA reactors are technically owned by the government makes them "roughly comparable" to "past instances of government-owned dual-purpose nuclear facilities."

**Comment:** This statement not only insults the reader's intelligence, it is duplicitous. From a nonproliferation standpoint (the title of this section), crossing the line from civilian to military is in not remotely comparable to crossing the line the other way.

1.3.6 The DEIS attempts to discuss DOE's current projections for future energy demand.

**Comment:** The DEIS does not make clear whether TVA's projections include conservation measures to reduce demand and/or development of renewable energy resources.

1.4 DOE describes the NEPA strategy and the tiering (sic) of this decision from the Programmatic EIS.

**Comment:** DOE describes here a process which paves the way for an action that may prove unwise and untenable—that tritium will be produced in one of two ways even if the environmental impact statements for each demonstrate the impact to be drastic of prohibitive. DOE apparently leaves itself no room to back out, a position which runs counter to the intent of NEPA.

1.4 DOE references the Record of Decision (60FR63878) compelling the two current EISes (linear accelerator and commercial light water reactor)

**Comment:** Does 60FR63878 stand regardless of the outcome of the EISes which tier (sic) from it?

1.5.1.2 The DEIS describes two Environmental Assessments on the Lead Test Assembly, one by DOE/TVA and an "independent" environmental assessment (small letters) by NRC.

**Comment:** It is distressing at this point to learn of the "independent" NRC environmental assessment. Apparently it was independent of any public participation. As such, it stands as a private government document and deserves the skepticism of a public shut out of its preparation process.

1.5.2.4 The DEIS notes that TVA has been preparing a Bellefonte conversion EIS and that the EIS is on hold pending the outcome of this EIS.

**Comment:** It is unclear why the preparation of this EIS should impact the Bellefonte conversion EIS. It seems to make more sense to complete the conversion EIS so that the people living near the sites can make a decision about what they would like to see in their community—an operating fossil fuel electricity generating facility or a bomb plant. If this tritium CLWR EIS is going to influence the Bellefonte conversion, it should incorporate the conversion EIS in its entirety since they are connected actions.

**CHAPTER 2: Purpose and Need**

The DEIS attempts to place the proposed action in a historic context. Any such effort much include the Nuclear Nonproliferation Treaty and its obligation to pursue complete nuclear disarmament. The United States ratified this treaty in 1970. In 1996, the International Court of Justice upheld the obligation of the US and other nuclear states to comply with the treaty obligation.

7(cont'd)

6(cont'd)

8/09.07

9/05.08

10/05.09

11/05.05

2(cont'd)

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

There is no reading of the Nuclear Nonproliferation Treaty which can countenance the construction of new facilities to create tritium.

This section also raises the question of "need." DOE claims, based on a Presidential finding, that the US "needs" tritium by 2005. Yet DOE's own charts—first printed in the PEIS on tritium production and repeated here make clear that there is no "need" for tritium until at the very earliest 2011 and, using material currently decaying "in the pipeline," until 2016. Realistic projections of further arms reductions (see our Comments at the scoping hearing for this EIS) based on maintaining a reasonable deterrent arsenal and using excess tritium from the pipeline, indicate no "need" for tritium until 3032 at the earliest.

Of course, it is the position of the Oak Ridge Environmental Peace Alliance that the US should abolish its nuclear weapons arsenal and lead other nations to do the same. Our position is shared, incidentally, by arms control experts and at least one former President of the United States. Yet the DEIS is dismissive of this scenario, suggesting at least that it is considered unreasonable.

In fact, DOE's position—that we "need" tritium by 2005—is unreasonable for at least two reasons:

First, it is based on a Presidential directive which, according to the international court of justice, violates our obligations under the Nuclear Nonproliferation Treaty which is the law of the land. The President does not have the right to violate laws, and even a "presidential directive" does not carry the force of law when it is counter to a law.

Second, given the half-life of tritium, at least half of any tritium produced in 2005 (when DOE claims for the purposes of this document that we "need" it) will not be available when we truly will need it—in 2016. The nature of tritium is such that it only makes sense to produce the tritium as needed *when* it is needed; it simply has too short a shelf-life to be producing quantities of tritium a dozen years in advance of the time of need. DOE increases risks and the likelihood of environmental impacts by producing tritium in 2005—in order to have a predetermined amount of tritium available in 2016, DOE must produce twice as much tritium in 2005 as it would have to produce in 2015 to meet the same need.

DOE also notes in this section the presence of a five-year reserve of tritium which currently exists. The reserve tritium, being bound by the laws of physics, is not preservable. It is decaying. Tritium obeys the "use it or lose it" law. DOE should use this tritium before producing new tritium; the presence of a five year reserve simply adds five years to the time we "need" tritium.

**CHAPTER 3: Commercial Light Water Reactor Program Alternatives**

3.1. The DEIS says that tritium can be produced "during the normal operation of a CLWR."

**Comment:** On page 1-15, DOE says producing tritium in a commercial light water reactor on the scale proposed by DOE will generate additional spent fuel wastes. Removal and shipment of TPBARs is also not "normal." The DEIS must be forthright about the changes in normal operations required to accommodate DOE's proposal to produce tritium.

3.1.2 The DEIS describes the Tritium Producing Burnable Absorber Rods, saying they are "long, thin tubes that contain lithium 6..."

**Comment:** Is all the lithium-6 necessary for these TPBARs already available or will lithium-6 need to be produced for this purpose? (The separation of lithium-6 from lithium-7, historically performed for nuclear weapons production at Oak Ridge's Y-12 plant, is responsible for the extensive mercury contamination for which Oak Ridge is so notoriously well known.) If lithium-6 will need to be produced, the environmental impacts of production must be thoroughly documented in the EIS. "3.1.2 The DEIS refers to a "maximum leakage rate of tritium for each TPBAR." | 14/19.08

5(cont'd)

12/17.01

13/19.07

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

**Comment:** At the public meetings for the Environmental Assessment on the Lead Test Assembly (the first TPBARs to be inserted in Watts Bar) DOE repeatedly assured the public that leakage from TPBARs was virtually impossible. Explain fully, please.

3.1.3 The DEIS states that "some tritium is expected to permeate through the TPBARs during normal operation, which would increase the quantity of tritium in the reactor's coolant water system."

**Comment:** At the public meetings for the Environmental Assessment on the Lead Test Assembly (the first TPBARs to be inserted in Watts Bar) DOE repeatedly assured the public that leakage from TPBARs was virtually impossible. Explain fully, please.

3.2.1 The DEIS states that DOE needs at least 4,000 TPBARs/year to produce its desired quantity of tritium.

**Comment:** Since TPBAR irradiation takes place during a normal fuel cycle, this means at any one time at least two and probably three reactors would be employed in the production of tritium. Currently, DOE has only one uncompleted reactor officially "offered" by TVA; this would appear to be inadequate to meet DOE's "need."

3.2.1 The DEIS explains what impacts are considered for completed and uncompleted reactors.

**Comment:** The EIS should also provide a comparison between the two—between Watts Bar and Bellefonte, for instance, in order to allow the reader to understand the true choice from an environmental impact point of view. The purpose of NEPA is to compel the government to choose from among reasonable alternatives that which has least adverse impact on the environment. If the government owns all the TVA reactors, which this EIS claims for the purposes of making its nonproliferation argument, DOE can compel tritium production in whichever TVA reactors have the least environmental impact (in this case, saving the taxpayer several billions of dollars).

3.2.1 The DEIS states that transportation impacts are based on an assumption that 4,000 irradiated TPBARs per year are transported.

**Comment:** The evaluation of transportation impacts should be straightforward, based on DOE's actual expected timing. If TPBARs are to be shipped on a regular basis, at the minimum rate, stretched throughout the year, the scheme for analyzing transportation risks presented here may be appropriate. If, on the other hand, TPBARs will be transported in bursts—3,400 over a relatively brief period every eighteen months, for instance—the analysis should address that scenario.

3.2.1. The DEIS assumes completion of Bellefonte by 2005.

**Comment:** The DEIS should be subjected to a reality check and more reasonable projections should be used based on progress thus far on Bellefonte (begun twenty-three years ago) and the schedule of TVAs most recently completed reactor, Watts Bar I.

3.2.1 The DEIS explains that it is essentially deferring questions about the management/storage of spent fuel.

**Comment:** Since Watts Bar does not have fuel storage capacity for the time period under consideration in this proposed action (40 years), issues of spent fuel storage and management can not be finessed but must be discussed in detail, specific to each reactor under consideration.

3.2.3 The DEIS defines "reasonable alternatives."

14(cont'd)

4(cont'd)

15/06.07

16/18.03

17/09.08

18/17.04

4(cont'd)

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

**Comment:** Since some of the reactors under consideration as "reasonable alternatives" are not officially available to DOE (the TVA offer having been withdrawn) they are, essentially, like all the other commercial or government-owned reactors in the country unavailable to DOE. The criteria DOE is using to define "reasonable alternatives" must be explicitly stated.

4(cont'd)

Table 3-5, page 3-16 Lists gaseous emissions of 282.5 Curies on an annual basis.

19/14.13

**Comment:** This does not appear to be an insignificant number. A clear accounting of the radionuclides should be included.

3.2.5.2 Description of the facilities under consideration as reasonable alternatives.

**Comment:** The DEIS does not consider the possibility of an attack by hostile forces on these plants which would be making materials essential to the US arsenal of nuclear weapons of mass destruction. Given the fact that these facilities would be the least protected and least safeguarded of all US nuclear weapons facilities, this is a possibility which must be contemplated and included in the analysis. We note from the map and description here that the Sequoyah plant is located only 7.5 miles from Chattanooga, a major metropolitan area, making it a comparatively attractive target for terrorists.

20/22.01

Table 3-9 lists annual releases of gases from Sequoyah plants.

**Comment:** The units of measure (presumably curies) for "other radionuclides" should be added; the "other radionuclides" should be identified.

19(cont'd)

3.2.5.3 The DEIS describes Bellefonte Nuclear Plants 1 and 2

**Comment:** According to the DEIS, the chronology of Bellefonte construction is this:

- construction begins in 1975
- construction halted in 1988
- construction begins in 1992
- construction halted in 1994
- announcement of conversion to fossil fuel in 1996
- announcement of scheme to complete as nuclear in 1997

17(cont'd)

The EIS, in determining the reasonableness of completing Bellefonte for tritium production by 2005 should provide information on how complete Bellefonte currently is, how realistic the 2005 date is, and what size of spent nuclear fuel cooling pool is being (or has been) designed and constructed.

3.2.6.1 The DEIS says, "Such conversion [of Bellefonte to fossil fuel] would be independent of this EIS and would not occur until after a decision were made regarding the role of Bellefonte 1 and 2 in tritium production.

**Comment:** This sentence tries to assert that the consideration of Bellefonte's conversion to fossil fuel is independent of this EIS at the same time that it states explicitly that it is dependent on the outcome of this EIS. The decision to convert Bellefonte to fossil fuel, taken in 1996 by TVA, is now being withheld pending the decision under consideration in this EIS—it is by definition dependent on this EIS and should be acknowledged and treated as such, despite the NEPA headaches which might be created by such acknowledgement of the facts.

11(cont'd)

**CHAPTER 4—Affected Environment**

**General Comment:** The EIS fails to give adequate consideration to the analysis of environmental justice issues, dismissing them in one brief statement.

21/13.08

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

Environmental justice asks this question: Are impacts being disproportionately visited on people of color or low-income communities? The DEIS asserts the answer is no (5.2.3.10).

It is not enough to make this assertion, nor is it adequate to disguise adverse impacts on specific populations by describing a wide circle around the plant and drawing generalizations about the population living there. Environmental Justice doesn't ask in general about large areas; it asks specifically: are the people living closest, most likely to be impacted, low-income, people of color, or both?

For example: At Sequoyah, the DEIS draws a circle with a 50 mile radius around the plant and draws conclusions based on averages for the population within that huge area. Closer inspection, however, notes that the per capita income level for the closest community to the plant, Soddy Daisy, is less than half the income level for the entire county (Hamilton) which is circumscribed by the large circle. (4.2.2.8, p.4-47).

21(cont'd)

This one instance where the DEIS provides information to make a comparison raises immediate environmental justice concerns. The EIS must include a thorough examination of environmental justice issues which answers the fundamental question: Are the people living nearest the plant—those most likely to be exposed to environmental insults—disproportionately low-income or people of color communities (or both)?

Table 4-35 The DEIS addresses economic impacts of the proposed decision.

**Comment:** The DEIS here addresses economic issues. (In response to Comments from the scoping hearing, the DEIS seems to pretend that economic questions are outside the scope of the EIS. NEPA, however, requires federal agencies to consider "the whole of the human environment," which obviously includes economic questions.)

11(cont'd)

The DEIS fails to include in any of its analysis a comparison of the eventual decontamination and decommissioning costs between Bellefonte as a nuclear site and Bellefonte as a fossil fuel electricity generating plant. It should do so, since these are the possible futures for Bellefonte. Absent a role as a tritium producer, Bellefonte will not be completed as a nuclear plant.

4.2.3.11 The DEIS describes storage capacity at Bellefonte and says each unit has a storage pool which has the capacity to hold 1,058 spent fuel assemblies.

22/17.05

**Comment:** Does this mean it can or can not accommodate 3,400 TPBARs every eighteen months for forty years?

**CHAPTER 5: Environmental Consequences**

Table 5-42 The environmental consequences of environmental impacts under different conditions for dry cask storage (required where pools are not adequate, such as Watts Bar) are considered using a generic matrix.

23/17.06

**Comment:** The information about earthquake and tornado damage is not sufficient to allow the reader to determine the adequacy of this method of estimating environmental impacts.

5.2.7 The DEIS states that DOE will provide needed low-enriched uranium for additional fuel assemblies from its own supplies using uranium downblended from the US nuclear weapons program.

24/01.07

**Comment:** Despite the identification of the nonproliferation concerns associated with this scheme in earlier public meetings, the DEIS does not address this question. DOE currently has at its disposal

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

quantities of highly enriched uranium which has been determined to be excess to our national security needs. In recent years, DOE completed an EIS covering the downblending of this material for use in commercial nuclear reactors.

At the time DOE withdrew highly enriched uranium from the larger Programmatic Environmental Impact Statement of the Disposition of surplus fissile nuclear weapons materials, it did so for the explicit purpose of indicating to the world our determination to remove this material from the nuclear weapons arena. The decision was advertised to the public and other nations as one driven by nonproliferation concerns. It was critically important that we not only voice our resolve but that we take concrete steps to make that resolve manifest.

Does DOE not now care about the nonproliferation message sent to the public and the world by this proposed action? Are other nuclear or near-nuclear nations to be played as fools on the world stage, joined by the American people?

On the one hand, we removed the highly enriched uranium from our nuclear stockpile to show our determination to reduce our reliance on the nuclear arsenal in order that other nations would be encouraged to do the same. On the other hand, we now propose to take that very same material, downblended, and return it to the nuclear weapons production pipeline by using it to produce tritium to maintain our arsenal at levels which exceed the START 2 levels and violate the Nuclear Nonproliferation Treaty.

Surely this madness has direct, immediate, and profound proliferation concerns which must be addressed in this document. Additionally, it undermines any confidence the public might have had in DOE's determination to deal honestly and forthrightly regarding special nuclear materials—the solution to that, of course, is not for DOE to add another section to this document, but for it to abandon its current scheme.

Tables 5-50, 5-51 lay out the actual expected releases of tritium to the environment in a table which compares normal operation of Watts Bar and Sequoyah to operation with TPBARs in place.

*Comment:* DOE/TVA should highlight for the public these facts, not immediately apparent from the tables, especially in light of the fact that at previous hearings (cf. Spring City, TN) DOE assured the public the TPBARs were virtually leakproof.

- Each TPBAR is assumed to leak 1 curie of tritium per year (p. C-19)
- Total releases of tritium to the air during normal (no accident) operations will be 60 times higher at Watts Bar if tritium is being produced. (Table 5-50)
- Total releases of tritium to the water will be five times as much during normal (no accident) operations if tritium is being produced at Watts Bar.
- In accident conditions, releases of tritium to the air (failure of two TPBARs) at Watts Bar would increase nearly 300 times. Ninety-nine percent of the tritium released would be due to tritium production under this proposed activity.
- In accident conditions, releases of tritium to water will be nearly thirty times as high—an additional 17,010 curies—from tritium production.
- Under normal operations, (Table 5-51) the annual dose for people living as far as fifty miles from the Sequoyah nuclear plant will triple (10.5 person-rem v. 3.2 person-rem).

Table 5-53 addresses cumulative impacts at Bellefonte comparing Bellefonte as a nuclear site with Bellefonte as a nuclear site making tritium for bombs.

*Comment:* Comparison should be between Bellefonte as a nuclear plant making tritium and Bellefonte as a fossil fuel plant, since absent DOE's billions of dollars for tritium, Bellefonte will not be

24(cont'd)

25/14.05

11(cont'd)

**Commentor No. 94: Oak Ridge Environmental Peace Alliance**  
**Presented by Ralph Hutchison (Cont'd)**

completed as a nuclear plant.

**OTHER COMMENTS**

A-23 This appendix considers tritium production operations. Numbers on page A-23 indicate that Bellefonte would produce an additional 1,863 spent fuel assemblies if it were selected to produce tritium. This number exceeds the total capacity of Bellefonte's current spent fuel pools.

In the response to Comments section, the DEIS further muddies the water about the "need" for tritium, stating (F-6) that the Presidential requirements take into account "recent international arms control agreements." According to DOE's own figure, however (Figure 2-1, p. 2.2) the US currently has enough tritium to maintain the stockpile at START 2 levels until 2011 (2016 if the reserve is used). Both of these presentations can not be true at the same time.

The response to questions about why tritium is "needed" by 2005 if produced in a reactor but not "needed" until 2007 if produced in an accelerator is not adequate. It would appear that the same solution (using the reserve for a few years and replenishing it from new production) could apply as easily to reactors as to an accelerator. The fact, which DOE should come clean about, is that we do not "need" tritium by 2005. We just want it by then to feel more secure. And we are loudly going through the process of securing tritium production by then not because we "need" it (by any measure) but in order to try to pressure other nations to do what we want with their arsenals. This commenter notes that it is logic reminiscent of the old "Bizzaro World" skits on *Saturday Night Live* during the Reagan administration to try to compel others to do what you want by doing precisely the opposite.

The third Comment on page F-10, addressing Nuclear Weapons, asserts that tritium production is consistent with and fully supportive of the commitments of the US under a variety of treaties, including the Nonproliferation Treaty. This response is a lie—a statement intended to deceive. As the International Court of Justice ruled in 1996, the US is not upholding its treaty obligations under the nonproliferation treaty and the production of tritium for the sole purpose of maintaining a large arsenal into the next century directly contradicts our obligations under Article VI of the treaty. It is incomprehensible—beyond even the wildest gymnastics of language or logic—to state that maintaining our large arsenal is consistent with our obligation to pursue complete disarmament.

The response to the final Comment in the DEIS (p. F-12) asserts that "moral and ethical issues are beyond the scope of the EIS." But NEPA clearly states that an EIS must consider the whole of the human environment. In fact, the decision to seek to protect the natural environment and wildlife is a moral decision; the inclusion of environmental justice concerns is the result of nothing other than moral considerations; economic issues are heavily freighted with moral considerations. Abstract moral and ethical issues may present a greater challenge to the preparers of an EIS and may confront federal decision-makers with information they would choose to ignore, but it is possible to consider and even quantify the effects of many moral decisions. This commenter asserts, DOE denials notwithstanding, that moral and ethical issues are already present in abundance in this EIS, and the issues raised at the scoping meeting, while uncomfortable to contemplate and difficult to quantify, deserve full consideration throughout this decision-making process.

11(cont'd)

26/17.07

2(cont'd)

6(cont'd)

27/01.10

Commentor No. 95: Thomas J. Stone**SAVANNAH RIVER REGIONAL DIVERSIFICATION INITIATIVE**

P.O. Box 606, Aiken, South Carolina 29802, (803) 593-9934 ext. 1400 FAX (803) 593-4296

**RESOLUTION**

**WHEREAS**, tritium is a critical ingredient in nuclear weapons and its ready availability is essential to the continued national security of the United States; and

**WHEREAS**, the U.S. currently has no domestic tritium production capability; and

**WHEREAS**, the United States Government is currently considering two technology alternatives, including use of existing commercial light water reactors, for meeting future tritium needs; and

**WHEREAS**, the merging of defense and peaceful uses of nuclear energy in a single facility as would occur in using a commercial power reactor for production of tritium has been counter to national policy since the commencement of the Atomic Age; and

**WHEREAS**, the existing commercial reactors proposed for tritium production would not be located on a secure Department of Energy defense production site and would not be under the Department's direct control and oversight; and

**WHEREAS**, the use of commercial power reactors for defense purposes violates the historical separation between peaceful and defense uses of nuclear energy and could be expected to erode public confidence and support for commercial nuclear power facilities;

**NOW BE IT RESOLVED** that the Savannah River Regional Diversification Initiative Board of Directors opposes the use of U.S. commercial light water reactors for production of tritium.

**ADOPTED THIS 22<sup>nd</sup> DAY OF SEPTEMBER 1998 AT AIKEN, SOUTH CAROLINA.**

*Thomas J. Stone*  
Thomas J. Stone  
Chairman

*Robert M. Reich*  
Robert M. Reich  
Secretary

1/01.09

Commentor No. 96: Ralph E. Crafton

AddressID: 41 Date Updated: 10/8/98 3:12:27 PM  
First Name: MI: Last Name: Title:  
Ralph E Crafton Boilermaker  
Organization:  
Address: 413 Martin st.  
City: Scottsboro  
State or Province: AL Postal Code: 35768 Country: USA  
Work Phone: Fax Number:  
Email Address: crafton@hiwaay.net Home Phone: 256-259-4642

Notes: I started working at Bellefonte nuclear plant in 1976 I saw this plant being built I would like to see it finished by the DOE & TVA. This part of AL TN need theses kind of job I was laid off in 1985 from Bellefonte. I would like to work there again. I support the nuclear industry & the DOE.

1/07.03

**Commentor No. 97: James S. Arrington**

AddressID: 42 Date Updated: 10/9/98 7:43:49 AM  
 First Name: MI: Last Name: Arrington Title: Mechanical Engineer  
 James S Arrington Mechanical Engineer  
 Organization: TVA, Watts Bar Nuclear Plant, Site Engineering  
 Address: EOB 2N-WBN  
 City: Spring City  
 State or Province: TN Postal Code: 37381 Country: USA  
 Work Phone: 423-365-1605 Fax Number: 423-365-1750  
 Email Address: jsarrington@tva.gov Home Phone: 423-693-4714

Notes: This message is to Stephen Schinki.  
 I was at the meeting last night at Rhea County HS and did not get to ask my question. I was wondering if DOE had pursued another option, other than CLWR & ATP. For instance, I believe it would be possible, as the bird sits in the silo the hydrogen decays into 50% helium & 50% hydrogen thereby significantly reducing the boosting effect. If at the time of launch, a squib valve blows allowing the helium/hydrogen to blowdown into a winding of silver-palladium tubing which is wrapped tightly around a pyrotechnic device which is ignited at the same time the squib valve blows, the tubing would become white-hot thereby passing the helium thru the walls of the tubing and separating the helium from the hydrogen, arming the warhead with pure hydrogen while the missile is in flight. This option would negate the high cost of tritium production, why hasn't a third option been pursued???? Thanks and keep up the good work.

1/01.03

**Commentor No. 98: David & Willie Bellomy**



**COMMENT FORM**

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I ~~am~~ AM ~~OPPOSED~~ OPPOSED  
TO THIS BEING PUT IN Bellefonte  
BECAUSE OF WHAT IT WOULD DO TO THE  
ENVIRONMENT, THE AIR-WATER, WE NEED  
TO THINK OF OUR CHILDREN & GRANDCHILDREN.  
OUR TENN. RIVER IS ALREADY DIRTY, YOU  
CAN CHECK AND SEE IF I AM RIGHT ABOUT  
IT BEING ONE OF THE 10 IN THE NATION  
ALSO THERE ARE A LOT OF PEOPLE IN THIS  
AREA

1/10.03

I WILL NOT SUPPORT  
THIS UNLESS IT IS NATURAL  
GAS!

2/07.06

I WAS AT THE DOE MEETING HELD AT NORTH  
EAST COMM COLLEGE MOST OF THE PEOPLE  
FOR THE PRODUCTION OF TRITIUM AT BELLEFONTE  
WAS FROM OUT OF TOWN. I HAVE LIVED IN  
JACKSON COUNTY & SCOTTSBORO ALL MY LIFE & KNOW  
THE MAJORITY OF PEOPLE IN THIS AREA. MOST OF  
THE CARS WE SAW IN PARKING AREAS WERE FROM  
OUT OF TOWN.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: David & Willie Bellomy (optional)  
 Organization: Home Owner  
 Address: P.O. Box 434 - 425 Campground Circle  
 City: SCOTTSBORO State: AL Zip Code: 35768  
 Work phone: \_\_\_\_\_ Home phone: 574-5303  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

Also They made it clear we would hear from

Mail to: Public Officials,  
 U.S. Department of Energy, Commercial Light Water Reactor Project Office,  
 ATTN: Stephen Schinki  
 P.O. Box 44539,  
 Washington, D.C., 20026-4539

THANK YOU  
Willie Bellomy

**Commentor No. 99: Louise Gorenflo**

Louise Gorenflo  
185 Hood Drive  
Crossville TN 38555

10/9/98

Dear USDOE

I oppose TWA making tritium for the Department of Energy.

\* US insists that other nations do not use their civilian reactors to make weapons materials. The U.S. should act in a consistent manner.

1/01.09

\* The U.S. does not need tritium now. Half of the tritium made today will be decayed by the time it is needed.

2/02.02

\* The tritium project is an expensive waste of tax dollars. If we want to strengthen our national defense, we need to put these dollars into educating our children.

3/23.13

\* Production of tritium will violate the Nuclear non-proliferation treaty that obligates all nations to nuclear disarmament.

4/01.04

\* Tritium production endangers the health of the local community. ~ Louise Gorenflo

5/14.04

**Commentor No. 100: Richard & Lucy Henighan****COMMENT FORM**

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: \_\_\_\_\_

Tritium is highly radioactive and very dangerous. Its manufacture, despite planned safeguards, demands unequivocal need, which does not exist. The need for tritium depends on the number of nuclear weapons the US will maintain in the new century, and the environmental impact of tritium is tied up centrally with the environmental impact of nuclear weapons & the international arms race. Our treaty obligations (the nuclear nonproliferation treaty), and the growing risks due to international proliferation of nuclear weapons demand continuing restraint by the United States, as the leading nuclear power, and negotiated decreases in our nuclear stockpile. A 1000 bomb arsenal, more than adequate to deter attacks, would not require any additional tritium until nearly a third of the way thru the next century. Manufacturing tritium now will only impede the process of nuclear disarmament and nonproliferation, with all the heightened risk of regional or global catastrophe associated with any use of nuclear weapons. In addition the manufacture of tritium in commercial settings will greatly increase the risk of proliferation, since it breaches a fundamental principal of nuclear policy up to now: the separation of peaceful and military uses of nuclear power. The draft EIS does not deal with those issues adequately and the process of approval for this project should not go forward.

1/14.04

2/02.02

3/01.04

4/01.09

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Richard Henighan / Lucy Henighan (optional)  
Organization: \_\_\_\_\_  
Address: 419 Mt. View Dr.  
City: Seymour State: IN Zip Code: 37865  
Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

7/4/98



**Commentor No. 101: Kenneth W. Holt**



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control  
and Prevention (CDC)  
Atlanta, GA 30341-3724

October 5, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attn: Mr. Stephen Sohinki  
P.O. Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinki:

We have completed our review of the Draft Environmental Impact Statement (DEIS) for the Production of Tritium in a Commercial Light Water Reactor [DOE/EIS-0288D]. We are responding on behalf of the U.S. Public Health Service, Department of Health and Human Services. Technical assistance for this review was provided by Dr. Felix Rogers, Radiation Studies Branch (RSB), National Center for Environmental Health, Centers for Disease Control and Prevention (CDC).

The DEIS Sections, Appendices C, D, and E dealing with potential adverse human health effects resulting from Environmental releases of radioactive or hazardous materials to the environment appear to be well developed and comprehensive. Radiological and hazardous waste exposures to the public from environmental releases resulting from normal operations, operational accidents, and transportation were estimated using information on source terms and potential at-risk years. Exposure modeling used to project the impacts on the health of the public due to radiological and chemical releases included meteorological data, hydro geologic data, and potential release scenarios that included both facility and transportation accidents.

Risk estimate endpoints for the public included 1) excess cancers from radio nuclide and chemical exposures, 2) cancer fatalities from radio nuclide exposure, 3) adverse genetic effects from radio nuclide exposure, 4) hazard quotient from exposure to nonradioactive materials. Risk from radiological exposures were estimated using NCRP 1993 risk estimates. The uncertainties in the DEIS risk analysis procedure included model uncertainty, source term uncertainty, scenario uncertainty, and parameter uncertainty (sampling error, data sources).

Environmental pathway modeling done by the reviewer show little exposure to off site individuals from facility accidents or normal operations. The risk to public health from the operation, transportation and accident scenarios as expressed by the DEIS are low and reasonable expectations from operations of Commercial Light Water Reactors.

1/14.06

**Commentor No. 101: Kenneth W. Holt (Cont'd)**

Page 2 - Mr. Sohinki

Thank you for the opportunity to review and comment on this DEIS. Please send us a copy of the Final EIS, and any future environmental impact statements which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely,

*Kenneth W. Holt*

Kenneth W. Holt, MSEH  
Special Programs Group (F16)  
National Center for Environmental Health

cc: Felix Rogers, Ph.D.

1(cont'd)

Comment Documents

Commentor No. 102: Bre Nicole Reiber

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ARTHUR ZILBER, MD  
Professor Emeritus of Psychiatry  
NYU School of Medicine

Attaches to identification persons only

Executive Director  
NEMO PERSON

Printed on eternally virgin free paper



October 6, 1996

Stephen Sohinski  
U.S. Department of Energy  
P.O. Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinski:

I am writing on behalf of the New York City chapter of Physicians for Social Responsibility, a nonprofit public education organization representing 1,200 health professionals and concerned citizens in the New York metropolitan area. After reading the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor, I am deeply concerned with the DOE's inaccurate interpretation of national and international laws and its downplaying of the public health effects of low-level radiation.

The EIS asserts that "the use of CLWRs for tritium production (is) not prohibited by law." That is not accurate. Section 57e of the Atomic Energy Act prohibits the government from using commercial nuclear power plants to facilitate the development of nuclear weapons. It is noted in the EIS that "historically, there have been numerous exceptions to the practice of differentiating between U.S. civil and military facilities." It fails to mention, however, that these historical exceptions came with extreme financial and environmental costs, as there would be today.

Next, the issue of nuclear nonproliferation is of paramount concern to PSR members. I would like to point out that tritium production for the purpose of maintaining a nuclear arsenal does violate a very important international treaty—contrary to what is stated in the EIS. As a signatory of the Nonproliferation Treaty (NPT), the U.S. has an obligation to work in good faith towards complete nuclear disarmament. Tritium production announces our intent to maintain a nuclear arsenal—and other nations can be expected to follow our lead.

Last, the EIS avoids the most important issue with regard to

475 Riverside Drive • Room 551 • New York, NY 10115  
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Commentor No. 102: Bre Nicole Reiber (Cont'd)

low-level radiation exposure: there is no safe low dose of low-level radiation. Radiation exposure can result in an array of adverse health effects, with cancer being the most lethal. Additionally, the U.S. has yet to find a safe, permanent storage facility for radioactive waste; until it does so, creating more radioactive waste—no matter how small—is environmentally and socially irresponsible. Countless studies have shown that man-made radiation is *not* a near-harmless, natural extension of background radiation, as DOE and EPA public relations claim.

While I was disappointed that the Senate approved of CLWRs for tritium production, I was pleased that the DOE will receive no funding for it in FY 1999. In the interim, I hope the DOE will be more thorough in considering its impact on national and international obligations, on human health, and on the environment.

Sincerely,

Bre Nicole Reiber  
Executive Assistant

Commentor No. 103: William D. Scarbrough



COMMENT FORM

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- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments: I have only had time to review the summary of the impact statement. I realize that it is prepared by advocates. Starting from this and my limited personal background the following opinion is hereby issued. I am sure more learned opinions will prevail. As I perceive this, any solution problem will not be any greater than that which already exist for the TVA area.

The actual Tritium extraction occurs in areas already over exposed to mismanagement. TVA areas would only expose special control rods and ship them to the extraction plant. It appears that this in no way adds significantly to any existing situation.

I am concerned that the Atomic Safety/Health Inspection does NOT have a absolutely ~~not~~ spotless history in environmental safety. We do however already have energy production in the valley and it appears that control rod exposure could provide for great financial enhancement and efficiency for our area and AEC tritium production. Also it accomplishes this with a minimum of exposure to perceived dangers.

*It seems nothing over, starting from scratch. or I should.*

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Wm D Scarbrough (optional)  
 Organization: RETIRED  
 Address: 3503 Spafman Dr NW  
 City: Huntsville State: AL Zip Code: 35810  
 Work phone: N/A Home phone: 256 852 9330  
 Fax: \_\_\_\_\_  
 E-Mail Address: \_\_\_\_\_

1/10.04

2/24.07

3/08.02

4/23.13

Commentor No. 104: Jennifer Stephens

*Plumbers & Steamfitters Local 498 Gadsden, Alabama*

Good Evening Ladies and Gentlemen,

It is apparent to me that those of you who object to the use of Bellefonte as the site for the extraction of tritium have many valid reasons for your opposition, not the least of which include your deep concern for the health and well-being of yourselves and your families. We, the proponents of tritium production at Bellefonte, are concerned about our families as well. I must assume that those of you in opposition have occupations which allow you to see you families each and every day. You wake up in your own bed every morning. You go to your job every day. And you return to your home every evening. However, many of us in this room are denied this aspect of daily life which you take for granted. We, or our spouses, have occupations which require us to travel hundreds of miles away from our homes because there is no where in northern Alabama for us to make a living. We must wake up in strange beds, work in strange towns, and live in strange motels while we are away. We keep in touch with our families by telephone. We do not get the luxury of watching our children grow up. We miss birthdays, school functions, our kid's baseball games, anniversaries. We miss being able to come home each night.

Now, it may be easy for those of you to whom I am speaking to just say, "Get a different job." Well, that's not the answer. The economy of northern Alabama was booming when we began our careers. Unfortunately, industry moved north, and therefore, so did our jobs. Its time to bring the jobs back home.

The thought of 4,500 temporary and 700-800 permanent jobs becoming available in northern Alabama is almost too great a prospect for us to even think about. These jobs do not only mean that we will be able to work at home, they mean that the local economy will undeniably increase. We will be here to purchase our gasoline, our food, and our work-related items. We will be here, in northern Alabama, putting our money back into our own economy. Everyone will benefit.

Why should we continue living in the dark ages? Nuclear technology is here and it is not going to go away. Our direct risks from that technology are minuscule compared to the risks we will all take when we leave here tonight and drive home. If tritium is not produced at Bellefonte, it will be produced somewhere else. This means that all of the benefits I just spoke of, will continue to be benefits to some other area of the country. We do not want this to happen anymore. We need the jobs here. We need to boost our own economy for a change. We need to be at home, so we too, can be with our families.

1/07.03

**Commentor No. 105: Mary Ellen Bowen****Comments Received via "800" Number**

<b>Date:</b>	Oct 16, 1998
<b>Name:</b>	Mary Ellen Bowen
<b>Organization:</b>	
<b>Address:</b>	Lewis County, TN
<b>Phone #:</b>	(931) 964-2534
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I just want to state that I do not want you to proceed with the use of tritium or any other thing to keep the nuclear power industry alive. I think that it is wrong and that it is hurtful to the people and the planet and please put a stop to it. Thank you.

**1/14.04****Commentor No. 106: Dot Houser****Comments Received via "800" Number**

<b>Date:</b>	Oct. 19, 1998
<b>Name:</b>	Dot Houser
<b>Organization:</b>	
<b>Address:</b>	46 Sherry Drive Ringo, GA 30736
<b>Phone #:</b>	(706) 866-7239
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am voicing a very strong opinion of not putting tritium at the Bellefonte plant near Scottsboro, Alabama in Jackson County. There are enough people down there dying with cancer as it is with much radiation, contaminated air, and everything as it is, but there are a lot of older folks there. They do not need this. The people that live in that area are not educated enough to run plants like that, they would have to bring in employees to run the plant and it is not a good idea. Absolutely, I just resent this being pushed down the throat of us North Alabama people. We have a second home there. We live in North Georgia, but we are in North Alabama since we opted to have a second home there and this just hurts me to the bone when I think about something like that coming to that area, it really does, but I trust that somebody else will take it somewhere else. Thank you for your time

**1/14.04****2/13.01**

Commentor No. 107: Robert H. Page

AddressID: 43 Date Updated: 10/16/98 9:14:59 AM

First Name: MI: Last Name: Title:  
Robert H Page

Organization:

Address: 2 Stacey Circle  
City: Signal Mountain  
State or Province: Tn Postal Code: 37377 Country: USA

Work Phone: 860-447-1791 Fax Number: 860-440-0404

Email Address: pagerh@gwsmtb.nu.com Home Phone: 423-886-6856

Notes:

From what I've read, The US will need to continue with Tritium too maintain our weapons.  
I support the production of Tritium in a commercial reactor. What we do in the USA does change our concerns or position for countries trying to develop weapons capabilities, or our lessen our influence in deterring proliferation.  
I do not support the spending of an estimated \$5 billion on an unqualified, dedicated defense technology at the Savannah River Site.  
The Bellefonte proposal to finish a viable commercial reactor, should cost the taxpayers less.  
provide needed electricity in a more safely regulated industry, and spread the gov't spending to more than one state.  
The regional support for TVA is justifiably very high, while the National concensus is that the Savannah River Site is an environmental liability.  
Please think green (dollars and environment) and go with Bellefonte.  
Thank you for your support,  
Robert and Antonette Page

1/07.03

Commentor No. 108: Dr. Chris Gunn

13 oct 98

At 6,643 feet, Clingmans Dome is the highest peak in the Great Smoky Mountains National Park. The platform is provided to present an unparalleled view of the national park.

Photo by Adam Jones



Dear DOE -

Please visit these mountains and our people. Get away from DC and your paperwork and realize just how we do not need or want tritium in our TVA reactors. The danger, the waste of the short-sighted planning are all threats to US - all of us.

Sincerely,

*Chris Gunn*  
Chris Gunn

Dr. Chris Gunn  
PO Box 1104  
Cullowhee, NC 28723

US Dept of Energy  
Commercial Light Water  
Reactor Project

PO Box 44539

Washington

DC 20026-4539

1/14.04

2/23.13

3/02.01

SPACE RESERVED FOR U.S. POSTAL SERVICE

**Commentor No. 109: Dorothy J. Mock**

Dorothy J. Mock  
46 Skyland Drive  
Pineah Forest  
NC 28768

United States Department of Energy  
Commercial Light Water Reactor Project  
Post Office Box 44539  
Washington, DC 20026-4539

To Whom It May Concern (To Whom I Address My Concern):

I urge you, I entreat you, I implore you: do not permit tritium to be made--not in any reactor anywhere in the United States!

Tritium is extremely dangerous. Tritium is not needed; we should not be making nuclear bombs!

Most important, as we move into the twenty-first century, making tritium violates the Nuclear Nonproliferation Treaty the US signed and ratified over 25 years ago. For us/US to violate this treaty weakens our hand in efforts to limit and control the spread of nuclear weapons among the nations of the world.

Shouldn't the United States be leading the world toward disarmament instead of demoralizing such efforts by producing tritium?

I urge you, I entreat you, I implore you: do not make tritium!

Sincerely yours,

*Dorothy J. Mock*

1/07.02

2/02.01

3/14.04

4/01.04

**Commentor No. 110: Earl Budin, M.D.**

Submitted by EARL BUDIN, M.D. *Earl Budin*  
co-chair, Physicians for Social Responsibility  
SANTA BARBARA  
Assoc. Clinical Professor of Radiology, UCLA  
Medical Center

**COMMENT FORM**

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- faxing your comments to 1-800-531-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail: 1-800-332-0801

**Comments:** The proposal to use a civilian nuclear power reactor to produce Tritium for use in nuclear bombs would be a terrible mistake and I strongly object to that proposal for the following reasons:

1. The most important reason is that this would be a violation of the Nuclear Non-proliferation Treaty which declares that every government must work toward a world-wide agreement on a treaty to abolish all nuclear weapons as an urgent goal to be achieved in the shortest time period. If we produce more Tritium this would send a message to other countries that we intend to keep nuclear bombs and make it very difficult to reach agreement on their abolition.
2. World-wide abolition of nuclear weapons has been the stated goal of our president and of recent chief of staff of our armed forces Gen. Colin Powell, as well as of a large number of high ranking generals and admirals of U.S. and other countries who in a recent statement called for the abolition of all nuclear weapons, recognizing the fact that nuclear bombs are of no military value.
3. As noted on page 13 of the DEIS, we have on hand enough Tritium to maintain our nuclear weapons until the year 2010. Certainly we must by then have established a world-wide verifiable agreement on the elimination of nuclear weapons.
4. If "enhance the yield of a nuclear weapon" is the key function of Tritium (page 5, DEIS), we could maintain our present nuclear weapons without Tritium, since the explosive power of our present nuclear bombs already makes them infeasible for military use.
5. The proposal to use commercial nuclear power reactors to produce Tritium for nuclear bombs would violate the long-standing U.S. policy to keep military and civilian nuclear reactors separate.
6. To establish a new use for civilian nuclear power reactors is counter to the growing world-wide consensus that nuclear power should be eliminated as a source of energy since it is inherently unsafe, uneconomic and most importantly unnecessary.

1/01.04

2/01.01

3/02.02

4/01.03

5/01.09

6/24.08

Submitted by Earl Budin, M.D. *Earl Budin M.D.*

co-chair, Physicians for Social Responsibility, Santa Barbara chapter

Associate Clinical Professor of Radiology, UCLA Medical Center

Address: 2415 Stanwood Drive,  
Santa Barbara, CA 93103

Commentor No. 111: Virginia Thrasher

Comments Received via "800" Number

Date:	Oct 26, 1998
Name:	Mrs. Virginia Thrasher
Organization:	
Address:	2716 Hanover Circle Birmingham, AL 35213
Phone #:	
Fax #:	
Comment #:	

Comment:

I am calling for a copy of your Environmental Impact Statement. What you all are planning to do up in Scottsboro, Alabama, the Commercial Light Water Reactor, is what I want the EIS on. If it includes any information as to why there's any reason to continue with this project in view of the fact that nuclear reactors are being demolished throughout other parts of the United States, I just want some justification for it other than that you need to create jobs, which I realize are very necessary.

1/02.01

Commentor No. 112: R. D. Liska

AddressID:	45	Date Updated:	10/25/98 5:00:31 PM
First Name:	MI:	Last Name:	Title:
R	D	Liska	concerned citizen
Organization:			
Address:	115 S. Oakwood		
City:	Republic		
State or Province:	MO	Postal Code:	65738 Country: USA
Work Phone:	Fax Number:		
Email Address:	auggie8@uno.com		Home Phone:
Notes:			

Hello DOE.  
Why must Trifium be produced for nuclear weapons? Is not there enough death and insanity in the world as is? Put your time, money, and energy into building safe and clean nuclear power plants. Put your time, energy, and money into cleaning up the nuclear waste you are now and have produced. How many people will this project end up killing? I thought we were getting rid of our nuclear stockpile.

2/23.13

1/01.01

4/02.01

**Commentor No. 113: Richard J. Sturtridge**

AddressID: 47 Date Updated: 10/26/98 8:25:17 PM

First Name: Richard MI: J Last Name: Sturtridge Title: Owner

Organization: Jalan-Jalan

Address: Box 128122

City: Nashville

State or Province: TN Postal Code: 37212 Country: USA

Work Phone: ( ) 385-2321 Fax Number: ( ) 385-7288

Email Address: artworkdesign@home.com Home Phone:

Notes: I am appalled and frightened to hear that you are planning hearings for the production of Tritium in a commercial light water reactor in my home state of Tennessee. I am appalled at the thought of using a civilian facility for the production of weapons of nuclear destruction and frightened by the thought of the creation of yet another cancer producing facility in a State already suffering from a dangerously poor environmental record. Do us all a favor and stop it now.

1/01.09

2/14.04

**Commentor No. 114: Ronald Allen****Comments Received via "800" Number**

<b>Date:</b>	Oct 26, 1998
<b>Name:</b>	Ronald Allen
<b>Organization:</b>	
<b>Address:</b>	10324 West Blue Springs Court Homosassa, FL 34448
<b>Phone #:</b>	(352) 628-0994
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

As a taxpayer, I am very concerned that the Government do this tritium in the Bellefonte and the other TVA plants versus the Savannah River plant because of the cost -- talking a great deal of money more for Savannah River to do it versus TVA. I would very much like some more information. If you would mail this to me on this issue and I would appreciate it that you make my comments known. Thank you.

1/23.15



**Commentor No. 115: Patricia Pelot Sanders**



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- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

Comments:

*NO TRITIUM* | 1/23.13  
*It's a waste of money.* | 2/14.04  
*It's dangerous.* | 3/01.04  
*It violates US treaty obligations.* | 4/02.02  
*It's absurd to make it before you need it.*

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: *Patricia Pelot Sanders* (optional)  
 Organization: *U.S. citizen*  
 Address: *P.O. Box 1275*  
 City: *M'boro* State: *TN* Zip Code: *37133*  
 Work phone: *(615) 896-0255* Home phone: *(615) 896-0255*  
 Fax: *(615) 893-2688*  
 E-Mail Address: \_\_\_\_\_

7496

**Commentor No. 116: Leigh Haynie for Wild Alabama**



**WILDLAW**

A Non-profit Environmental Law Firm

Executive Director

Ray Vaughan  
 300-B Water Street, Suite 208  
 Montgomery, AL 36104  
 334/265-6529  
 334/265-6511 (fax)  
 e-mail: [wildlaw@aol.com](mailto:wildlaw@aol.com)  
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 Jeff Richardson, J.D., FL  
 Cielo Sand, TN  
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 Dave Foreman  
 Dr. Reed Noss  
 James Redfield

October 26, 1998

U.S. Department of Energy  
 Commercial Light Water Reactor Project Office  
 Attn: Mr. Stephen Sohinki  
 P.O. Box 44539  
 Washington, DC 20026-4539

**RE: Comments on Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor**

Dear Director Sohinki:

On behalf of Wild Alabama, a non-profit outdoor recreation and environmental organization, I am filing the following comments on the Draft EIS for the proposed conversion of a commercial light water reactor into a tritium producing facility.

Wild Alabama's initial and greatest concern is the Department of Energy and TVA's blithe assertions that while tritium is radioactive, it must be produced. No options; no alternatives. The purpose of an EIS is to present all possible, viable alternatives. Instead, the documents provided interested parties contain nothing more than bureaucratic filler for foregone conclusions. The fact that you provide a chart with 18 reactor combinations does not give the vulnerable public the "alternatives" required by NEPA; nor does the consideration of producing tritium in an accelerator provide an alternative.

The EIS is woefully inadequate and incomplete. Assertions by the DOE that waste will be produced and that storage of that waste may be stored on-site or may be stored in a federal storage

1/06.01

2/05.11  
 3/16.02

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

facility does not satisfy the requirements of NEPA. Comments cannot be made with such indecision and inconsistency. Complete information cannot be provided by DOE until after March of 1999 when the post-irradiation tests will be studied from Watts Bar. A lack of mitigation measures and a lack of concise and complete discussions of impacts by the proposed production also inhibit adequate comments. The DOE spends an admirable amount of time with drawings and explanations of what will happen during the process of production, but the DOE becomes vague and noncommittal when discussing the impacts this will have on the environment. Another inadequate section is found in §5.2.10 where the DOE states that accidents as a result of sabotage will not be addressed because of their speculative nature. In the next Draft EIS, the DOE needs to further explain why this is a speculative argument with the growth of extremist terrorist organizations. The United States is no longer impervious to terrorist attacks as the World Trade Center bombing illustrates. The environment and safety issues require just as in-depth and clear scientific explanation as tritium production.

The alternatives in the EA did not consider a broad enough range. Each alternative (excluding the no action alternative) provides for the same amount of tritium production. The EIS fails to provide adequate justification and discussion of how the DOE arrived at the due date of 2005 to start production of tritium (other than the fact that the 1996 Nuclear Weapons Stockpile Plan is accompanied by a Presidential Decision Directive that mandates new tritium be available by approximately 2005 IF a CLWR is the selected option for tritium production). The EIS also fails to provide adequate support for the production of 3 kilograms of tritium per year. Finally the EIS fails to provide the data and figures as to why DOE needs forty years of tritium production at 3 kilograms a year.

One reasonable alternative would be to moderate the amounts of tritium produced to fewer number of years of production and/or smaller yearly levels. According to the chart on page 12 of the summary, the DOE will not reach 1996 NWSM stockpile levels until 2010, which could be a delayed start-up date. (The DOE can borrow expertise from modern accounting procedures where inventory is not delivered until it is needed thereby increasing efficiency in relation to time, money, and storage space.) This is another alternative not considered by the DOE. All of the DOE's alternatives result in the same amount of tritium in the same amount of time, and with the cursory consideration of the no action alternative, all of the alternatives will result in production dependent on TVA. This is legally insufficient.

A particularly instructive case is *Friends of the Bitterroot, Inc. v. U.S. Forest Serv.*, No. CV-90-76-BU, 25 E.L.R. 21186 (D. Mt. 1994). There, even though the Forest Service identified and considered seven alternatives, the Court held that the Forest Service failed to comply with NEPA because the agency failed to consider just one additional reasonable alternative, namely an alternative to protect roadless areas. The agency claimed that such an alternative would not further the purposes of the proposed action, but the Court disagreed. The Court held:

"In Count II of their complaint, as amended, plaintiffs contend the Trail Creek

3(cont'd)

4/05.10

5/24.14

6/05.12

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9/02.02

10/03.03

8(cont'd)

2(cont'd)

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

EIS fails to adequately analyze all reasonable alternatives, including a less environmentally damaging alternative that would exclude logging and road building activity in existing roadless areas within the Beaverhead National Forest. Plaintiffs maintain the EIS should have addressed an alternative exempting the Beaver Lakes roadless area from the timber sale in order to preserve that area's value as secure wildlife habitat. In response, defendants assert the alternative would not have met the management goals, standards, and objectives of the Beaverhead National Forest Plan. Defendants further maintain the development of such an alternative would not have added any new information to the EIS.

"NEPA requires an EIS provide information in detail and consider every reasonable alternative to a proposed action. *Citizens for a Better Henderson, supra*, 768 F.2d at 1057; see 42 U.S.C. § 4332(2)(c)(iii). An agency's range of alternatives is reviewed under a 'rule of reason' standard that 'requires an agency to set forth only those alternatives necessary to permit a reasoned choice.' *California v. Block*, 690 F.2d 753, 767 (9th Cir. 1982) ('The touchstone for [a court's] inquiry is whether an EIS' selection and discussion of alternatives fosters informed decisionmaking and informed public participation.'). Additionally, NEPA does not require a separate analysis of alternatives which are not significantly distinguishable from alternatives actually considered or which have substantially similar consequences. *Northern Plains Resource Council v. Lujan*, 874 F.2d 661, 666 (9th Cir. 1989). As a result, an agency's consideration of alternatives is sufficient if it examines an appropriate range of alternatives, even if it does not consider every available alternative. *Headwaters, Inc. v. Bureau of Land Management*, 914 F.2d 1174, 1181 (9th Cir. 1990).

"In the case sub judice, the Forest Service examined seven alternate courses of action with respect to the Trail Creek project: six 'action' alternatives (Alternatives B, C, D, E, F, and G) and one 'no action' alternative (Alternative A). The 'action' alternatives proposed timber harvesting in varying locations, amounts, and methods in the Trail Creek area. Moreover, the action alternatives all called for varying degrees of timber harvesting in the Beaver Lakes roadless area.

"Defendants maintain the plaintiffs' preferred alternative 'would not have met the management goals, standards, and objectives defined in the Beaverhead National Forest by the Beaverhead Forest Plan.' Specifically, defendants maintain that 'because the management decisions to harvest timber in those areas have already been made at the Forest Plan level it did not need to be revisited.'

"The fact the Beaverhead Forest Plan designates certain land as suitable for timber management does not, however, obligate the Forest Service to proceed with the timber harvesting, nor does it preclude the Forest Service from exercising its

2(cont'd)

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

discretion to consider other courses of action. Accordingly, to the extent defendants maintain an alternative aimed at preserving the Beaver Lakes roadless area would be 'pointless,' based upon the goals of the Beaverhead Forest Plan, the court concludes defendants' summary judgment motion is not well taken. Defendants' position is contrary to NEPA's underlying tenet, i.e., that agencies consider all reasonable alternatives so as to ensure an EIS fosters informed decision making. See *Idaho Conservation League v. Mumma, supra*, 956 F.2d at 1519-20.

"The Forest Service cannot deny there is some benefit to be derived from considering an alternative that preserves the Beaver Lakes roadless area. Plaintiffs, as well as the Montana Department of Fish, Wildlife & Parks, whose considerable expertise in the area of wildlife management is undisputed, expressed concerns that preservation of the Beaver Lakes roadless area warranted full consideration in the Trail Creek NEPA process given the area's high security value for wildlife. Moreover, plaintiffs have alleged the roadless areas provide wildlife corridors essential for maintaining the biological diversity in the Northern Rocky Mountains.

"Given the contentious and long-standing debate in the State of Montana regarding the preservation of roadless lands and wilderness designation, the court concurs with plaintiffs' assertion that the NEPA process would have been properly serviced by development of an action alternative that preserved roadless lands in the Trail Creek area. Such an alternative would have afforded the opportunity for scientific and public participation and debate regarding the delicate balance between preserving natural resources and timber management.

"Accordingly, the EIS' failure to address an alternative preserving existing roadless lands in the Trail Creek area renders compels this court to REMAND this matter for further administrative proceedings."

The Council on Environmental Quality (CEQ) administers and interprets NEPA. See *Abenaki Nation of Mississquoi v. Hughes*, 805 F. Supp. 234, 241 (D. Vt. 1992), *aff'd*, 990 F.2d 729 (2d Cir. 1993). 40 C.F.R. § 1502.14 makes abundantly clear that the DOE has failed to adhere to the regulations and therefore the EIS should be revised again to address each of the following requirements. This section is the heart of the environmental impact statement. Based on the information and analysis presented in the sections on the Affected Environment (Section 1502.15) and the Environmental Consequences (Section 1502.16), it should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public. In this section agencies shall:

(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

2(cont'd)

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.

(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

(d) Include the alternative of no action.

(e) Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.

(f) Include appropriate mitigation measures not already included in the proposed action or alternatives.

Only a brief survey of the preceding requirements is needed to demonstrate that the DOE has failed to address all but one item, item D. While the DOE provides the public with a tome of bureaucratic jargon, the DOE fails to identify alternatives that were dropped from consideration and why they were dropped from consideration. This is a violation of NEPA. In the eyes of the DOE, each alternative will result in approximately the same impact even though one set of the reactors, Bellefonte, is not in production and sits idle. The fact that the DOE glosses over the cataclysmic change that will occur in northeast Alabama due to the start-up and production of radioactive materials emphasizes the glaring weaknesses of this EIS. This is a violation of NEPA. What is the DOE's preferred alternative? Where, if at all, is there a discussion of the mitigation measures that will be in place once production is started? Mitigation measures will be needed at all three CLWRs with the construction of the ISFI and the impacts on endangered species. 40 C.F.R. § 1508.20 defines mitigation to include (a) Avoiding the impact altogether by not taking a certain action or parts of an action. . . (c) rectifying the impact by repairing, rehabilitating, or restoring the affected environment .(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action, and (e) Compensating for the impact by replacing or providing substitute resources or environments. The DOE must address the issue of mitigation measures and adequately examine those in the Final EIS.

Within this Comment letter, we point out two alternatives that the EIS did not, and it is apparent that the DOE fails to adhere to the rules and regulations of NEPA. As we have outlined at least two viable but unexamined alternatives that could be used to address the tritium problem, the EIS is inadequate and must be reissued.

The EIS spends sufficient time examining the technical aspects of tritium production, but fails to thoroughly examine issues outside of its expertise, such as ecosystem and economical considerations. With all of the activity affecting the viability of the aquatic wildlife such as the mussels and native fish and with all the unnatural diversions of water, at least four dams between the three proposed Commercial Light Water Reactors, what is to be gained environmentally, and

2(cont'd)

11/12.03

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

in the long run economically, by choosing a Commercial Light Water Reactor? Since TVA has been planning on converting Bellefonte to a fossil fuel plant, how will the destruction of that plan affect the economics of the surrounding area? Where is the comparison of economic gain to be won with tritium production over another fossil fuel plant?

**11(cont'd)**

**12/13.02**

The presence of Indiana and gray bats along with the endangered mussels and the endangered green pitcher plant prohibit the furtherance of any proposed actions at Bellefonte. No documentation is given as to WHO determined the green pitcher plant is not found in the vicinity of the plant or that it is not supposed to be found in this area. As to the Indiana bat, the DOE should be aware of its tenuous hold on existence and the federal court's measures to protect said species. As one federal district court has determined,

The Indiana bat was listed as an endangered species on March 11, 1967. Between 1960 and 1975, the bat's population decreased by 28%. In 1983, subsequent in time to the passage of the ESA, the U.S. Fish and Wildlife Service ("Fish & Wildlife") issued a recovery plan for the Indiana bat. Fish & Wildlife then designated seven (7) "Priority 1 hibernacula" where 85% of the Indiana bats currently hibernate. Despite the recovery plan's goal of halting the decline of the Indiana bat, the bat's population has continued to fall. Between 1960 and 1987 there was a 55% population decline at Priority 1 hibernacula, and a generally similar decline at Priority 2 hibernacula. [AR, Tab 38 GG 008]. According to the defendants' Indiana Bat Summer Habitat Management Strategy, "if the present rate of decline continues, the Indiana Bat Recovery Team projects that the species will be extirpated from Priority 1 caves, and perhaps become extinct, by the year 2040."

**13/12.04**

House v. United States Forest Service, 974 F.Supp. 1022, n.1, (8<sup>th</sup> Cir., 1997). In that particular case, the U.S. Forest Service was ordered to cease and desist all activities in an area inhabited by the Indiana bat. The DOE will have to provide much more information before it can proceed at Bellefonte, which includes site-specific information as to all species listed under endangered status and mitigation and habitat management plans for each species.

Agency decisions are subject to the "arbitrary and capricious" standard which applies in APA actions. *State of North Carolina v. Federal Aviation Administration*, 957 F.2d 1125, 1128 (4<sup>th</sup> Cir.1992). In order to apply this standard, a court must determine whether the decision was based on a consideration of the relevant factors and whether there has been a clear error of judgment. *Id.* (quoting *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 416, 91 S. Ct. 814, 823-824, 28 L. Ed.2d 136 (1971)). It is the DOE's responsibility to determine the suitability of Bellefonte for tritium production. While the DOE has notified the United States Fish and Wildlife Service of the existence of the Indiana Bat, the Endangered Species Act requires all federal agencies to consult in such a situation:

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

Each Federal agency shall, in consultation with and with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency (hereinafter in this section referred to as an "agency action") is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined by the Secretary, after consultation as appropriate with affected States, to be critical, unless such agency has been granted an exemption for such action by the Committee pursuant to subsection (h) of this section. In fulfilling the requirements of this paragraph each agency shall use the best scientific and commercial data available.

16 U.S.C. §1536(b).

To state, as the DOE does in Appendix B, that "...no additional impacts to biological resources would be expected from tritium production" fails to take the "hard look" as required by NEPA. In an EA the agency must take a "hard look" at the project and its impacts, "as opposed to bald conclusions, unaided by preliminary investigation," and must "identify the relevant areas of environmental concern." *Maryland-National Capital Park and Planning Commission v. U. S. Postal Service*, 487 F.2d 1029, 1040 (D.C. Cir. 1973). General, vague comments, such as "For partially completed CLWRs, the baseline and associated impacts would depend on the level of modification necessary to complete construction and the effluents resulting from the reactors' operation activities (EIS B-6), do not suffice as a "hard look." Furthermore, more explanation needs to be provided the public as to Table 5-24. Footnote b assures the reader that the radioactive release will significantly less than the limit of 20,000pCi/L for tritium, but what does that limit mean. Did the government set the limit where only one in a 100 will die from cancer or suffer the effects? What does that limit mean? The next EIS the DOE does must examine these limits in more detail and provide adequate explanation for the lay reader.

NEPA sets forth a "national policy which will encourage productive and enjoyable harmony between man and his environment [and] promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man." 42 U.S.C. § 4321.

The Eleventh Circuit has recently explained the genesis and overall approach of the Act:

"Prior to the passage of [NEPA], environmental considerations were systematically underrepresented in the federal agency decision making process. Consistent with traditional notions of natural resource allocation, the benefits of development were overstressed and less environmentally damaging alternatives for meeting program objectives were often given limited consideration. NEPA declares a broad national commitment to protecting and promoting environmental quality. This commitment is implemented by focusing government and public attention on the environmental effects of proposed agency action; The Act ensures that important environmental

**13(cont'd)**

**14/14.14**

**15/05.13**

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

consequences will not be 'overlooked or underestimated only to be discovered after resources have been committed or the die otherwise cast.' In short, NEPA requires that the evaluation of a project's environmental consequences take place early in the project's planning process."

*North Buckhead*, 903 F.2d at 1539-40 (citation omitted).

NEPA does not set out substantive environmental standards, nor prescribe any regulatory program. Rather, the congressional mandate of § 4321 is realized through a set of "action forcing" procedures that require an agency to take a "hard look" at environmental consequences. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 109 S.Ct. 1835, 1846, 104 L.Ed.2d 351 (1989); *Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council*, 435 U.S. 519, 558, 98 S.Ct. 1197, 1219, 55 L.Ed.2d 460 (1978). The procedural requirements derive from 42 U.S.C. § 4332(2)(C)(i-iv), which directs all agencies of the federal government to prepare for "major Federal actions" a detailed statement on (i) the environmental impact of the proposed action; (ii) any unavoidable adverse environmental effects if a project is implemented; (iii) alternatives to the proposed action; (iv) the relationship between short-term uses of the environment and maintenance of long-term productivity; and (v) any irreversible and irrevocable commitments of resources involved in the project's implementation.

An EIS is [supposed to be] an exhaustive analysis of the impacts, proposed mitigation, and alternatives to the federal project, which has been circulated to other involved agencies, see § 1502.19, subject to public comment and agency response, see § 1503, reviewed by the CEQ in case of interagency disagreement, see § 1504, and ultimately submitted to the President. The EIS, therefore, is the primary vehicle for compliance with NEPA where a project will have a significant impact on the environment. The EIS is the "action forcing" device envisioned by Congress to insure that NEPA's policies and goals are infused into federal decision making. 40 C.F.R. § 1502.1.

There is a failure to identify how Bellefonte, an untested site, is a viable alternative when of each proposed plant Bellefonte is the one that will receive the most significant impact. Whereas the other CLWRs already operate, therefore already experience increased levels of radiation, Bellefonte currently experiences no radiation. (EIS p. 5-67). Producing tritium at Bellefonte will increase radiation exposure exponentially. Your own EIS confirms this conclusion:

At Bellefonte, there would be a potential for secondary impacts arising from the proposed action. This is because Bellefonte reactors are currently not operating. While it is noted that any secondary impacts would be caused by the radionuclides other than tritium, these impacts would represent a change from no action. (EIS p.5-111).

There is absolutely no cumulative impacts analysis in this EA. The EA very briefly looked at some things called "cumulative impacts" but these were actually indirect impacts and nothing but

15(cont'd)

16/05.14

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

"cookbook" analysis at that. There is nothing site-specific at all about cumulative impacts, and there is nothing at all about other actions (public or private) in the area and how they will interact with this proposal. Reliance upon 1974 or older data from TVA does not suffice NEPA's "hard look" requirement. "Cumulative impacts" are not the things that happen later or some distance from this proposal, such as downstream sedimentation five years from now. Those are called "indirect impacts," which NEPA also requires the agency to consider. However, the DOE cannot forego its legally mandated consideration of cumulative impacts by mislabeling indirect impacts as "cumulative." Where is the cumulative analysis on Bellefonte's impact in conjunction with the Widows Creek Fossil Plant? Data from 1974 is too distant and not accurate enough to satisfy NEPA's requirements. Further analysis and measurements need to be initiated before a complete Draft EIS can be submitted.

Isolated references to impacts this proposed construction and operation at Bellefonte will have on the citizens and wildlife in this area are ineffective until the DOE analyzes those impacts cumulatively. For example, in Chapter 5 of the EIS, the DOE lists consequences that will occur from tritium production such as increased operational noise levels. After identifying the amount of noise increase and finding that wildlife will experience "startled responses," the DOE dismisses these responses as "causing little or no disturbance of wildlife on the site and thus should affect no changes in local wildlife populations." (EIS p. 5-50). This "little" disturbance combined with the "insignificant reduction in the aquatic macroflora and plankton" in the river (EIS p. 5-51) and the "small impact of radiological releases on aquatic species" (EIS 5-52) may combine to be a significant impact on the ecosystem as a whole. However, neither the writer or the reader knows since that kind of analysis is never produced by the DOE.

The EA is required to identify and consider cumulative effects:

"For each alternative, estimate the direct, indirect, and cumulative environmental effects, including the effectiveness of the mitigation measures, that would result from implementing each of the alternatives, including the no action alternative. Also, identify any additional mitigation measures that may be required, such as measures common to all alternatives."

1909.15 FSH § 15.

The CEQ Regulations are clear that cumulative effects involve impacts from other projects, but this EIS neither mentions nor identifies the impacts from a number of similar projects being proposed in this area or from past projects in the area.

16(cont'd)

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

The CEQ Regulations define "Cumulative impact" as:

"the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

40 C.F.R. § 1508.7 (Emphasis added.)

The CEQ Regulations also state:

"'Effects' include: . . . (b) Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems."

40 C.F.R. § 1508.8.

The EA labels a few charts as cumulative effects. Those charts, however, disclose only direct or indirect effects of the project. An example is that the EA discusses "cumulative" impacts on ecological from this proposal and this proposal alone. The EA assumes that general impacts from this proposal several years from now, such as the increase of water temperature, are "cumulative" impacts. (EIS at 5-115). That is a direct impact. While mentioning other TVA activities in or nearby the Tennessee River, nowhere does the EIS discuss the impacts of this proposal in addition to other similar actions in the area, whether on TVA projects or private activities. All the EIS discusses is the increase in radioactivity from tritium productions. While such discussion is appropriate, to limit cumulative impacts analysis to that one item is grossly inadequate. Another example of DOE's failure to present the facts in a proper way is the chart on page 5-43. According to the chart, only .0004 percent of the Tennessee River's water flow will be diverted to accommodate the needs of a plant producing tritium, yet the EIS fails to present how this diversion of water in conjunction with municipalities and industries and dams will affect the river.

Another failure of the DOE when discussing the impact on surface water and groundwater is the failure to convey in clear, accurate and simple terms what the effects to the human environment will be if a leak of tritium occurs. In Appendix B the EIS attempts to discuss the methods by which water resources and water quality will be monitored. Again, the EIS is replete with general surmises, especially concerning the partially completed facilities. The DOE concedes

16(cont'd)

17/11.10

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

there will be an impact when an idled plant is engaged, but apparently expects residents to appreciate the fact the DOE will monitor the change in water quality. Like normal hydrogen, tritium can bond with oxygen to form water. When this happens, the resulting water (called tritium oxide or tritiated water) is also radioactive. Because tritium oxide is chemically identical to normal water, it cannot be filtered out of the water. Once Bellefonte tritium hits the water supply there will be no way to retrieve it. To spend over 400 pages explaining the benefits of tritium and the wonders it will do for the economy and socioeconomic levels of the area, it is remiss and violative of NEPA to minimize and trivialize the negative effects that will occur. To dismiss concerns about the potentially significant and harmful effects of tritium production with some vague assurances the water will be monitored does not suffice. NEPA requires the government to analyze both positive and negative significant impacts. This EIS fails to follow those regulations.

NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. 40 C.F.R. §1500.1(b).

"An EIS serves two purposes: (1) to provide decision makers with enough information to aid the substantive decision whether to proceed with the project in light of its environmental consequence; and (2) to provide the public with information and an opportunity to participate in gathering information." *Big Hole Ranchers Association*, 686 F. Supp. at 260.

In relevant part, CEQ regulations define "significantly" as follows:

"Significantly as used in NEPA requires considerations of both context and intensity:

"(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action . . . .

"(b) Intensity. This refers to the severity of impact. . . . The following should be considered in evaluation of intensity:

"(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance

17(cont'd)

18/05.15

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

the effect will be beneficial

“....

“(4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

“(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

“(6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about future considerations.

“....

“(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

“(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for protection of the environment.”

40 C.F.R. § 1508.27. The DOE must take adhere to these regulations and provide the public with an EIS that adequately identifies how this proposed project will impact their environment as a whole.

There is a very limited discussion of other projects in the area, including some private lands. However, that section only gives cursory review to those actions, and nowhere does the EA ever identify and discuss the **IMPACTS** from those other actions. Cumulative effects analysis requires more than ticking off a list of other things in the area; it requires identification and analysis of the impacts from those actions and the proposed action together.

The lack of site-specific analysis is a clear violation of NEPA. All of the analysis in the EIS could be cut and pasted into another project anywhere else in the country. Site-specific analysis

18(cont'd)

16(cont'd)

19/12.05

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

cannot be cut and paste because it deals with the specifics of the project. The Department must address the impacts to the specific streams, plants, animals, etc. in the project area. All wildlife discussion in the EIS is based entirely upon generic statements with absolutely no site-specific supporting data or information. None of the information has been field-checked or verified in any way. There is no site-specific data on wildlife in this compartment, and there is no survey data showing what numbers of sensitive species occur in these areas such that the agency can adequately determine that the proposal will not adversely impact the viability of these species. Without actual site-specific data showing the number of individuals of a species and how many will be killed or displaced by this proposal, the agency cannot logically conclude that the viability of these species is assured in this area. The bottom line is the DOE must provide numbers and populations statistics. Even this EIS acknowledges that TVA activities on the Tennessee River have resulted in declining numbers of mussels and other aquatic life. Only with site-specific data and hard numbers will the DOE accurately convey the true impacts of this proposed action.

19(cont'd)

At no point in the EIS does the DOE consider possible attack on the transport of TPBARs from the production site to either Savannah River Site or the Richland, Washington site.

A blanket statement such as "No environmental impacts are expected as a result of compliance with both NRC and DOE safeguard and security provisions based on the adequacy of the existing TVA security provisions illustrates the cursory analysis given to such considerations as security. (EIS p. 5-106).

7(cont'd)

From a document well over 400 pages, the DOE sees fit to devote only two paragraphs to the important discussion of soils. (EIS p. 4-66). Soils can be what conduct the waste from this proposed activity; soils can be what protects the waste from entering the water table. Soil identification is necessary to evaluate storage options and stability for the future. Adverse impacts to water quality have not been analyzed properly. There is a lack of data on impacts from previous diversions. Tables 5-22 and 5-23 are antiquated charts from 1967 without any recent data to confirm what is in the water now, nor any qualified data as to what will be in the water once the proposed actions begin. The following statements do nothing to ease one's mind: "Water required from the Guntersville Reservoir would be a small fraction of the river flow, and most of it would be returned to the reservoir after use." (EIS p. 5-42).

20/10.02

21/11.07

The EA avoids any discussion of the economic impacts to recreation. This is a blatant failure to comply with the agency's NEPA duties. The EA fails to consider how the presence of an active radioactive production plant will affect the economics of recreation at the Guntersville State Park

22/13.03

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

and Reservoir. At no point in the EIS is there any discussion of the economics of fishing, hunting, hiking, wildflower viewing, bird watching, horse back riding or other recreational uses of these areas.

There are countless legal requirements to consider the economic impacts of this proposed plant to other uses. Some of these include:

"(B) Identify and develop methods and procedures, in consultation with the Council on Environmental Quality established by title II of this Act, which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decision making along with economic and technical considerations ...."

NEPA Section 102, 42 U.S.C. § 4332.

The analysis pretends that creating an active tritium plant where there is no activity now has no adverse effects on recreation. The DOE has an obligation to disclose these effects. It is not legal to pretend they do not exist or to ignore them merely because considering them would be "difficult."

"Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative."

40 C.F.R. § 1508.8.

The ID Team must contain the expertise necessary to evaluate the economic impacts of the project. Even if the economic impacts of recreation were truly "intangible" and difficult to address, the EA still cannot refuse to address the issue. Thus, the EA has not provided a legally adequate economic analysis.

In closing, my client, Wild Alabama, is opposed to the proposed tritium production at Bellefonte, in particular. Wild Alabama is particularly concerned that DOE will focus too heavily on the potential economic benefits from the Bellefonte site and will not weigh these benefits with the significant decreases in land resources, air quality, water quality, ecosystem quality and quality of life issues. In addition too much emphasis is placed on the fact that TVA announced in 1994 that Bellefonte would not be completed as a nuclear plant without a partner. However, in a general sense, my client finds the EIS is woefully inadequate for all proposed sites. The DOE sloughs off the

22(cont'd)

23/05.26

24/05.16

**Commentor No. 116: Leigh Haynie for Wild Alabama (Cont'd)**

difficult issues raised by tritium production at Bellefonte. To ask the citizens of Jackson County and north Alabama to trust the DOE that tritium is needed, but that the figures to support that are classified does not satisfy the open process of NEPA. It is also irresponsible to state that an explosion of the Bellefonte facility is outside of the scope of this EIS. Chernobyl is a mere decade behind us; residents around such facilities need to be informed of the results of such an explosion. While moral and ethical considerations may be beyond the scope of the DOE's analysis, issues such as life and death, healthy and unhealthy lives, and safe and unsafe water are not beyond the scope. The facts as DOE presents them are that there will be increase in the quantity of radionuclides to be released if and/or when an accident occurred; the tritium content in the liquid effluent will likely increase; there will be a likely increase in the generation of low-level radioactive waste, which must be stored somewhere with plans to store on-site; and there is a significant change in potential risks from proposed tritium production. The EIS completely fails to list and examine mitigation measures for these increased risks to the surrounding citizenry.

Besides learning how to make tritium and enjoying the excellent models and drawings, the EIS glosses over the environmental issues and dismisses the significant impacts this proposed project will have on the surrounding ecosystem, humans and all. At a minimum, DOE must be required to do the EIS over again after the testing is completed in the spring of 1999. This EIS is too early. Until the post-irradiation examination and studies are completed by DOE, no solid and specific information can be provided. After March of 1997, the DOE will be able to provide specific information, instead of general surmises. This proposed action will have a significant impact on the environment around the Bellefonte facility. To posit there will be no significant adverse impact when 3 kilograms of tritium is run through a facility that is idled and zapping no radioactivity waves in addition to the creation of low-level radioactive waste on site is the height of ludicrousness. Wild Alabama requests the DOE to delay reissuing another Draft EIS until such time as complete tests have been run on the TPBARs currently at Watts Bar 1.

Please make these comments part of the record. Thank you for your consideration.

Sincerely,

Leigh Haynie

Attorney for Wild Alabama

24(cont'd)

25/15.08

26/14.04

27/16.01

26(cont'd)

5(cont'd)

18(cont'd)

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18(cont'd)

4(cont'd)



**Commentor No. 117: Joanne MacNulty**

**Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Joanne MacNulty
<b>Organization:</b>	
<b>Address:</b>	PO Box 266 Paonia, CO 81428
<b>Phone #:</b>	(970) 527-6620
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am responding to the notion of creating tritium for war in a commercial reactor or 2 or 3, Watts Bar, Sequoyah, and Bellefonte. In the south, where I used to live, I can't tell you strongly enough what a crazy idea many of us out here think that is, not to mention illegal and counterproductive to life on earth. You have my written comment from a couple of months back, but I understand that the comment period is about up so I wanted to go on record of asking you, please don't do this thing. Thank you.

1/01.09

**Commentor No. 118: Monica Blanton**

**Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Monica Blanton
<b>Organization:</b>	
<b>Address:</b>	1629 Berkley Circle Chattanooga, TN 37405
<b>Phone #:</b>	(423) 756-8237
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I'm calling in opposition to the production of tritium at Bellefonte Nuclear Plant.

1/07.03

**Commentor No. 119: Marita M. Hardesty****Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Marita M. Hardesty
<b>Organization:</b>	
<b>Address:</b>	1235 Lonesome Pine Road Kingston Springs, TN 37082
<b>Phone #:</b>	(615) 952-5865
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I'm calling in regards to the proposal that more tritium be produced in civilian reactors. I am against the making of more tritium. I understand that the United States is in violation of treaties that have already been signed about nuclear proliferation and that tritium also has a shelf life and it decays at about 5% per year. Right now we have in our stockpile enough tritium until the early years of 2000, the 21<sup>st</sup> century. It is not needed. I am hoping that the majority of voices in our democracy will tell you that they don't want it and that the money spent on this unnecessary situation should be spent towards better causes. Thank you for your time.

1/01.04

2/02.01

3/23.13

**Commentor No. 120: Eskel Lind****Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Eskel Lind
<b>Organization:</b>	
<b>Address:</b>	515 3 <sup>rd</sup> Street Santa Cruz, CA 95062
<b>Phone #:</b>	460-0338
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am also calling on behalf of Ms. Roberts. She is also a Santa Cruz resident living on Paul Minnie Avenue. Her phone number is 475-8910. We are both opposing the development of tritium, the production of tritium, in the commercial light water reactor in Tennessee. We are against that component which is for the use of nuclear weapons and also for the impact upon the environment and for the safety of people. I don't like the idea of using civilian facilities for the production of that material and I don't like the use of that at all. To begin with...it causes cancer and it is not really that concerned about the...people and I think it is insane to be doing that to begin with, so I'm making my comment that I am against this. I'm against the production of tritium in a commercial light water reactor. O.K. Goodbye.

1/07.02

2/01.09

1(cont'd)

**Commentor No. 121: Joyce Rolce****Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Joyce Rolce
<b>Organization:</b>	
<b>Address:</b>	Nashville, TN
<b>Phone #:</b>	(615) 370-4032
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

This comment is from Richard and Joyce Rolce of Brentwood, Tennessee. We are very much opposed to the manufacture of tritium at TVA facilities or within Tennessee, the light water reactor program, and wanted to express our opposition to it. Thank you. Please contact me if you have any questions. Bye.

1/07.02

**Commentor No. 122: Beverly Charles****Comments Received via "800" Number**

<b>Date:</b>	Oct. 27, 1998
<b>Name:</b>	Beverly Charles
<b>Organization:</b>	
<b>Address:</b>	46 Radcliff Road Springfield, IL 62703
<b>Phone #:</b>	(217) 585-1329
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am calling to make a comment on the production of tritium in a commercial light water reactor. I do not see a need for this--it is a component for nuclear weapons--we are not at war and we, for sure, don't need to be selling it to anyone else. Although many people may not truly believe it, I believe a lot of these factors are a part of what is increasing the cancer rates--having been a victim of breast cancer myself, I am thoroughly against this type of production. Thank you.

1/02.01

2/14.04

Commentor No. 123: Maggie Colgan

AddressID: 48 Date Updated: 10/26/98 7:32:30 PM

First Name: MI: Last Name: Title:

Maggie Colgan

Organization:

Address:

City:

State or Province: Postal Code: Country: USA

Work Phone: Fax Number:

Email Address: MACOLGAN7@aol.com Home Phone:

Notes: Stop this insanity!! No CLWR in Tennessee

1/07.02

Commentor No. 124: Alex A. Pulsipher

AddressID: 50 Date Updated: 10/27/98 12:04:38 PM

First Name: MI: Last Name: Title:

Alex A Pulsipher

Organization:

Address: 816 maplehurst park apt #1

City: KNOXVILLE

State or Province: TN Postal Code: 37902- Country: USA

Work Phone: Fax Number:

Email Address: APULSIPH@ICX.NET Home Phone:

Notes: NO TRITIUM PRODUCTION IN CIVILIAN FACILITIES! END ALL PRODUCTION OF NUCLEAR WEAPONS NOW!

1/01.09

2/01.01

**Commentor No. 125: William W. Howell**

AddressID: 51 Date Updated: 10/27/98 10:43:33 PM  
First Name: William MI: W Last Name: Howell Title:  
Organization:  
Address: 1007 Stonewall Drive  
City: Nashville  
State or Province: TN Postal Code: 37220 Country: USA  
Work Phone: 615-297-2269 Fax Number: 615-385-2503  
Email Address: wwhowell@earthlink.net Home Phone: 615-269-4532

Notes: Having read the summary of the Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management, I am amazed that the proposal was not abandoned a long time ago. With the Cold War over and nuclear stockpiles being reduced, where is the justification for maintaining a stockpile? Why don't we just dismantle the weapons as the components age and deteriorate? I don't want my tax dollars squandered on this boondoggle.

1/02.01

2/23.13

**Commentor No. 126: Justin P. Wilson**



STATE OF TENNESSEE

DON SUNDQUIST  
GOVERNOR

October 27, 1998

Mr. Stephen M. Sohinki, Director  
CLWR Project Office  
U.S. Department of Energy  
P.O. Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinki:

As the Governor's Lead Contact for State of Tennessee National Environmental Policy Act (NEPA) reviews, I am providing comments in response to the U.S. Department of Energy - **Draft Environmental Impact Statement for the Production of Tritium in Commercial Light Water Reactor, DOE/EIS - 0288D dated August 1998**. The attached comments from state agencies represent the complete and official response of the State of Tennessee. These comments are limited to the scope of study appropriate for the aforementioned document. Please give these comments your full consideration as well as all comments presented by concerned citizens at your public meetings

The State firmly supports the maintenance of our national security. The proposed actions appear to further that goal without compromising the health and safety of Tennessee citizens or the protection of State resources.

1/14.06

The State makes the following comments:

- 1) The Department of Energy (DOE) should consider a specification that commercial reactors producing tritium be operated at a level appropriate for efficient power production, not a level that maximizes tritium production. Since risk of exposure is greatest during fuel rod replacement or transportation of spent nuclear fuel, this would minimize risks of accidental exposure. Operating the reactor at an inefficient level for power production increases the rate of fuel consumption, thereby increasing both the rate at which fuel rods are changed and the amount of spent nuclear fuel that must be transported and disposed. In addition, the EIS did not evaluate the operation of Bellefonte for maximum power efficiency as it did for Watts Bar and Sequoyah. The DOE should provide this analysis if it intends to produce tritium at Bellefonte.
- 2) The document should explain whether operational limits for a plant would be changed to produce tritium and whether those changes might affect National Pollution Discharge Elimination System (NPDES) permits under which that plant now operates.

2/14.15

3/11.02

State Capitol, Nashville, Tennessee 37243-0001  
Telephone No. (615) 741-2001

Commentor No. 126: Justin P. Wilson (Cont'd)

Mr. Stephen M. Sohinki  
Page 2  
October 27, 1998

3) The DOE should consider background and downstream monitoring of these facilities. || 4/11.03

We appreciate the opportunity to comment and will respond to additional opportunities in the future. If you have any questions, please contact our staff policy analyst at 615/532-4968 (fax 615/532-0740).

Sincerely,



Justin P. Wilson  
Deputy Governor for Policy

JPW/emw

cc: Mr. Milton H. Hamilton, Jr., Commissioner  
NEPA coordination file/Mr. Dodd Galbreath  
State NEPA Contacts  
Mr. James Chardos, Tennessee Valley Authority

Commentor No. 127: Earl C. Leming

STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DOE OVERSIGHT DIVISION  
761 EMORY VALLEY ROAD  
OAK RIDGE, TENNESSEE 37830-7072

October 5, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attn: Mr. Stephen Sohinki  
PO Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinki

**U.S. Department of Energy - Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor, DOE/EIS-0288D dated August 1998**

The Tennessee Department of Environment and Conservation, DOE Oversight Division (TDEC DOE-O) has reviewed the above Draft Environmental Impact Statement (EIS). The subject EIS was reviewed in accordance with the requirements of the National Environmental Policy Act (NEPA) and associated implementing regulations 40 CFR 1500, 1508, and 10 CFR 1021 as implemented.

The production of tritium at Sequoyah and/or Watts Bar and/or Bellefonte nuclear plants as described in the subject EIS does not appear to create a significant risk to the environment or human health, provided tritium production is at a level that allows efficient power production. Less efficient power production would result in additional spent nuclear fuel (SNF) with associated environmental and transportation risks. After review of the subject document, the Division offers the following comments for your consideration:

- The option of simultaneously burning mixed oxide (MOX) fuel and producing tritium in the same reactor was not discussed in the EIS. The EIS should explain why this option was not included.
- The National Environmental Policy Act (NEPA) does not specifically require cost analyses, however, due to extremely important and complex socioeconomic factors associated with the tritium production project, the EIS should include a complete cost analyses.
- If tritium is produced at levels that increase reactor fuel consumption, the EIS should clarify who owns the additional SNF and who will pay for its eventual treatment, storage, and disposal.

1/14.15

2/04.04

3/23.16

4/17.08

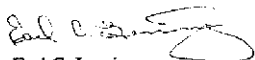
**Commentor No. 127: Earl C. Leming (Cont'd)**

The following request was made in the State's comments on the Notice of Intent (letter from J.P. Wilson to S.M. Sohinki dated March 6, 1998, with attached letter from E.C. Leming to S.M. Sohinki dated March 6, 1998). We again request that following data be provided to this office for review.

**"Environmental Impacts and Safety"**

Provide to the State and interested stakeholders the TVA sampling data from the primary coolant at the Watts Bar Pilot Project (both before) and during actual production of tritium. Send the data as it becomes available. Measurements of H-3 in particular should be provided. Since the tritium-producing burnable absorber rods (TPBARs) contain different materials than standard BARs, other relevant neutron activation products should be included in the data. Supply enough reference data to facilitate evaluation. Supply detection limits and bounding statistics."

Sincerely



Earl C. Leming  
Director

5/19.13

**Commentor No. 128: Joelle Key**



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
Division of Radiological Health  
3rd Floor, L & C Annex  
401 Church Street  
Nashville, TN 37243-1532  
615-532-0399  
INTERNET: jkey@mail.state.tn.us

October 26, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attn: Mr. Stephen Sohinki  
P.O. Box 44538  
Washington, D.C. 20026-4539

Dear Mr. Sohinki:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Production for Tritium in a Commercial Light Water Reactor. We have the following comments about this document.

1) The TPBARs being tested at Watts Bar will not be removed until 1999, and yet the decision of which technology is going to be used is going to be made by the end of 1998. Is it reasonable to make this decision before concluding the test at Watts Bar? If this decision can be made without this information, then there was no reason for the test to be run.

2) The production of tritium in a reactor will cause a significant increase in the amount of tritium in the coolant. The presentation of material in this report implies that the increase in the quantity of tritium is not significant. Section 5 compares the amount of tritium released annually under normal operations and the amount predicted with tritium being produced. On page 5-5 the comparison is made for gaseous emissions. In this example, it is stated that under normal conditions 5.6 Ci of tritium is released annually. With 1,000 TPBARs in the reactor, a release of 1,656.6 Ci of tritium is predicted. The footnote states that 1,550 Ci of this comes from the unlikely condition that 2 of the TPBARs fail. Even if none of the TPBARs fail, 1,550 Ci from 1,656.6 Ci leaves 100 more Ci released when tritium is being produced. This is almost 20 times as much tritium than is currently released from the commercial reactor. The same comparisons can be made for liquid effluents on page 5-6, with the increase being threefold. The dose assessment for these releases does show that they are well within federal guidelines, but the increase in the amount of tritium being release is significant should not be treated as if it is insignificant.

Sincerely,



Joelle Key  
Health Physicist

1/05.10

2/14.16

Commentor No. 129: Robert L. Foster, Jr.

STATE OF TENNESSEE  
 DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
 WATER SUPPLY  
 6th Floor, 401 Church Street  
 Nashville, Tennessee 37243-1549

October 26, 1998

U. S. Department of Energy  
 Commercial Light Water Reactor Project Office  
 Attn: Mr. Stephen Schink  
 P. O. Box 44539  
 Washington, D. C. 20026-4539

Re: U. S. Department of Energy - Draft Environmental Impact Statement  
 for the Production of Tritium in a Commercial Light Water Reactor,  
 DDC/EIS-0288D dated August 1998

Dear Mr. Schink:

The Tennessee Department of Environment and Conservation, Division of Water Supply has reviewed the draft environmental impact statement (EIS). The Division of Water Supply offers the following comments for your consideration:

- The proposed impact statement could be strengthened by requiring TVA, DOE and DOD to fund background and downstream tritium monitoring at public water system intakes that could potentially be impacted by the production of tritium. Sample containers should also be prepositioned for use in case of an accidental release of tritium by nuclear plants. The data generated by the monitoring should routinely be made available to the state and to the water systems for inclusion in consumer confidence reports along with a simple explanation anticipated health effects of the ingestion of tritium at the concentrations found in water at the intake.

1/11.03

Thank you for the opportunity to comment.

Sincerely,

*Robert L. Foster, Jr.*  
 Robert L. Foster, Jr.  
 Deputy Director

RLF/rif

Commentor No. 130: Christopher F. Turner

AddressID: 53 Date Updated: 10/28/98 5:19:48 PM  
 First Name: MI: Last Name: Title:  
 Christopher F Turner  
 Organization:  
 Address: 3056 Bowling Green Dr.  
 City: Walnut Creek  
 State or Province: CA Postal Code: 94598 Country: USA  
 Work Phone: Fax Number:  
 Email Address: cpd8@aol.com Home Phone: (925)937-6586

Notes: I just wished to express my thanks to all the members of the CLWR project for doing such important work in the development of tritium production. Many more feel the same way I do. Thanks

1/07.02



**Commentor No. 131: Judi Kazanas**



**COMMENT FORM**

The Department of Energy is interested in your comments on the *Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dp.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:** I fully support the production of tritium pro at the Bellefonte nuclear plant in Hollywood, Alabama. Secretary of Energy Richardson has many positive considerations at Bellefonte. From an aspect of cost, Bellefonte is by far the best choice to produce tritium. Environmental impact studies have been conducted in the region and have been favorable. Technical risk aspects have been thoroughly studied with a favorable report. Compatibility with respect to quantity & schedule, has been reviewed. The partnership of DOE & TVA represents a wonderful opportunity for Alabama & Tennessee to contribute to the military defense of our great country.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Judi Kazanas (optional)  
 Organization: \_\_\_\_\_  
 Address: 5700 Laurel Ridge Rd  
 City: Chattanooga State: TN Zip Code: 37416  
 Work phone: \_\_\_\_\_ Home phone: 423 344-1137  
 Fax: \_\_\_\_\_  
 E-Mail Address: jkazanas@aol.com

1/07.03

**Commentor No. 132: Madeline Duckles**



**Women's International League for Peace and Freedom**

United States Section  
 1213 Race Street, Philadelphia, PA 19107-1691  
 (215) 563-7110 • (215) 563-5527 (FAX)

**Berkeley-East Bay Branch**  
 P.O. Box 5576, Berkeley 94705  
 510-845-3737

October 26, 1998

**DRAFT ENVIRONMENTAL IMPACT STATEMENT  
 for the  
 PRODUCTION OF TRITIUM IN A COMMERCIAL LIGHT WATER REACTOR**

Using commercial reactors to produce tritium has serious environmental and public health impacts. Tritium is extraordinarily difficult to contain. Elevated tritium levels have already been found in the air and water around reactor sites. Far from harmless, tritium contamination has been associated with a variety of public health problems including birth defects and cancers.

In December 1991 coolant contaminated with tritium leaked into the Savannah River from a D.O.E. reactor. As a result, industrial and residential water plants in Georgia and South Carolina were closed for an undetermined period.

We do not believe these concerns have been adequately addressed in the subject E.I.S.

Women's International League for Peace and Freedom is very concerned that plans to produce nuclear weapons materials such as tritium in commercial reactors will do irreparable damage to non-proliferation goals. Until now the U.S. has maintained a clear distinction between weapons work and commercial programs, and it has tried to persuade other nations to do the same. Violating this long-standing policy would set a dangerous precedent worldwide.

Since no country poses a credible military threat to the U.S. and the Start II Treaty has been ratified by the U.S. Senate, there is no urgent requirement for more tritium than can be obtained from the scheduled dismantling of our nuclear weapons arsenal.

India and Pakistan have burst into the international scene with their recent nuclear tests and have thus joined the acknowledged nuclear powers (U.S., Great Britain, France, Russia and China). Israel is known to possess nuclear weapons, and Iran is approaching nuclear capability.

Other countries possess nuclear power plants. It would be irresponsible, to say the least, for the U.S. to lead the way to using commercial reactors for weapons purposes.

WOMEN'S INTERNATIONAL LEAGUE FOR PEACE AND FREEDOM.  
 Berkeley-East Bay Branch  
*Madeline Duckles*  
 Madeline Duckles, Chair

1/14.04

2/08.02

3/01.04

4/02.02

3(cont'd)

5/01.09

Comment Documents



### *Town of Woodville*

P.O. Box 94 • 26 Venson Street  
Woodville, Alabama 35776  
(205) 776-2860  
Fax: (205) 776-2796

October 2, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
ATTN: Mr. Stephen Sohinki  
P.O. Box 44539  
Washington, D.C. 20026-4539

Dear Mr. Sohinki:

In February 1998, the Woodville Town Council adopted a resolution in support of the production of tritium at the Bellefonte Nuclear Plant, and our position has not changed.

We believe that the production of tritium at Bellefonte poses no danger to the public and we feel confident that the plant can be operated in a completely safe manner.

Since the production of tritium by the Commercial Light Water Reactor method can be accomplished as a by-product of production of electricity, utilization of the Bellefonte Plant seems to be the most feasible and logical choice to produce the tritium needed for our national defense. North Alabama is proud of the contributions made and continue to be made to our nation's military programs.

Also, utilization of the Bellefonte Plant would provide an economic boost to an economic depressed area of our state. Therefore, for the above reasons, we continue to offer our support.

Sincerely,

*Glenda H. Hodges*  
Glenda H. Hodges,  
Mayor

### Commentor No. 134: Randy Horton

#### Comments Received via "800" Number

Date:	Oct. 30, 1998
Name:	Randy Horton
Organization:	
Address:	145 Fairhill Drive Wilmington, DE
Phone #:	302-234-7874
Fax #:	
Comment #:	

#### Comment:

I'm calling in support of the DOE proposal to open the Bellefonte Nuclear Plant. Thank you for your support. 1/07.03

1/07.03

Commentor No. 135: Colleen Lancaster

**COMMENT FORM**

The Department of Energy is interested in your comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

There are several ways to provide comments on this document and these include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting
- returning this comment form or other written comments to the address on the back
- faxing your comments to 1-800-631-0612
- commenting via the World Wide Web site: <http://www.dpe.doe.gov/dp-62>
- calling toll-free and leaving your comments via voice mail, 1-800-332-0801

**Comments:** My study of history tells me that, after World War II, a new "peaceful" role for nuclear energy would begin--not to be confined or restricted with the defense role. There was to be a wall between the two roles. Section 1.5.4 of the draft EIS attempts to muddy the water and imply "dual-use" has been commonplace. However, we are engaged in a discussion about making a bomb component in a civilian reactor. There is a difference! It is highly troubled by the breaching of the wall.

Admittedly, though, some breaching has already occurred because the civilian role has always been tainted by the defense role. As the defense role comes begging at the door of its good relative, the civilian role; and the civilian role must take up the slack in a period when the world doesn't seem to respect nuclear weapons and superpowers much.

My choice is

The No Action Alternative for the CUOR EIS -  
accelerator production of tritium at the  
Savannah River site.

We cannot have "dual-use" facilities in this country and then be glibly about dual-use technology we sell to other countries or pretend made of it by others to rogue nations.

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: Colleen Lancaster (optional)  
Organization:  
Address: 801 Spaul's Dr  
City: Breese Wood State: TX Zip Code: 37027  
Work phone: 615-741-0783 Home phone: 615-370-1572  
Fax:  
E-Mail Address: Plumbob344@aol.com

1/01.09

2/04.01

1(cont'd)

Commentor No. 136: Judith Cumbee

11076 CR 267  
Appt Dr 36843  
Oct 27, 1998

Mr. Stephen Smith, Director  
CUOR Project Office, US DOE  
PO Box 44539  
Washington DC 20026-4539

Dear Mr. Smith:

I write in total opposition to the Hahona Liquefied plant being  
contemplated to produce nuclear energy and tritium for nuclear weapons  
and in general opposition to any such production.

I am concerned about security for my state, our country  
and the world.

Believable, a <sup>commercial</sup> plant making nuclear bomb materials  
could become a target for terrorist action or a bomb attack by  
hostile forces. Such facilities could be the best protected of all U.S.  
nuclear weapons facilities and having them in my state certainly  
has not enhanced our security.

Do not believe in radioactive waste. The Five Vodka (as happened  
at the Savannah River Plant and which could also happen in  
transporting the irradiated TPBARS as well as the used fuel  
rod so the wastes) is another risk not to be taken in  
"Hahona the Beautiful."

Has further more it is just plain America the Beautiful  
to live up to her promise as a safe for the world. What moral  
authority do we have to demand Saddam Hussein for  
building weapons of mass destruction while we, a signatory  
of the Nuclear Non-Proliferation Treaty, involved in producing  
complete nuclear disarmament, ~~are~~ are set to continue  
to produce tritium for the continued production of  
nuclear weapons?

1/22.01

2/16.03

3/08.02

4/18.04

5/18.10

6/01.04

Commentor No. 136: Judith Cumbee (Cont'd)

The argument that there is no qualitative difference between TVA producing electricity for nuclear weapons and producing plutonium, that it is just "in effect" extending the past practice of using government-owned facilities simultaneously for civil and military purposes "is absolute contradiction to the intent of the International Atomic Energy Act. Using a commercial plant to produce weapons material would set a precedent for Iraq, China, and many other countries to disguise weapons development as civilian activities."

Security from accidents that will be generated not by nuclear energy and nuclear weapons, but by developing a reverence for life. For security, environmental, and moral reasons, these results, the Bellefonte plant - or any other - be used to produce tritium.

Sincerely,  
Judith Cumbee

P.S. - And, those who believe we need a nuclear deterrent: the National Resources Defense Council points out that 1000 U.S. troops - more than enough to serve as a deterrent - would not require additional plutonium until 2032... by that time, 34 lbs of any plutonium produced in 2005 will have decayed away. "Plutonium facility producing by 2000 would be defunct by 2040."

7/01.09

8/01.10

9/02.02

Commentor No. 136: Judith Cumbee (Cont'd)

**A Resolution Opposing Production of Tritium at the Alabama Bellefonte Plant**  
By the Peace-Justice Human Rights Committee of Alabama New South Coalition  
October 2, 1998

Whereas, the Department of Energy has prepared a Draft Environmental Impact Statement on the production of tritium in the TVA reactor at the Alabama Bellefonte plant;

Whereas, tritium, produced from uranium fission, is used for the trigger of nuclear weapons and the United States has more than enough tritium to last until 2015 if there are no more arms control treaties (and if there are, less will be needed);

Whereas, making bomb material in a commercial reactor violates the Atomic Energy Act which has always kept commercial and nuclear power separate for reasons of safety, security, and nonproliferation;

Whereas, the current course of developing additional radioactive materials for weapons use is in violation of the Nuclear Nonproliferation Treaty;

Whereas, serious safety flaws shut down reactors at the Savannah River Plant which produced plutonium and tritium,

Whereas, the Savannah River Site is heavily contaminated; carbon steel tanks holding 34 million gallons of radioactive liquid wastes developed leaks; "arsenic, mercury, tritium and other poisons contaminate site's ground and surface water (Atlanta Journal/Constitution 4/18/91);

Whereas, leakage of radioactive tritium and other poisons would cause severe environmental contamination in Alabama, endangering human and other life systems, even beyond the immediate site (in 1983 carcinogenic solvents were discovered under the Savannah River Site in the deep Tuscaloosa aquifer, which flows into Alabama);

Therefore be it resolved that the Peace-Justice-Human Rights Committee of the Alabama New South Coalition, which was founded on a platform that included support for a Nuclear Weapons Freeze, generally opposes further production of tritium and specifically opposes using the Bellefonte plant for such production, and

Be it further resolved that this notice of opposition will be forwarded to Stephen Sohinki, Director, CLWR Project Office, US Dept. of Energy, PO Box 44539, Washington DC 20026-4539 [or faxed to 800 631 0612 or sent to <http://www.dp.doe.gov/dp-62>, all to be marked: "CLWR EIS Comments] and to newspapers in the Scottsboro, Fort Payne, Huntsville, Anniston, and Birmingham areas.

9(cont'd)

6(cont'd)

3(cont'd)

10/14.04

11/01.01

12/07.03

**Commentor No. 137: Susan Gordon**

**Alliance for Nuclear Accountability**

**Member Groups**

American Friends Service Committee  
Denver, CO

Citizen Alert  
Las Vegas, NV

Coalition for Health Concerns  
Berkeley, CA

Concerned Citizens for Nuclear Safety  
Santa Fe, NM

Environmental Defense Institute  
Troy, NY

Fernald Residents for Environmental  
Safety and Health, Inc.  
Ross, OH

Global Resource Action Center for  
the Environment  
New York, NY

Government Accountability Project  
Seattle, WA  
Washington, DC

Harford Education Action League  
Spokane, WA

Heart of America Northwest  
Seattle, WA

Los Alamos Study Group  
Santa Fe, NM

Miamilung Environmental Safety &  
Health  
Miami, FL

National Environmental Coalition  
of Native Americans  
Prague, OK

Native Americans for a Clean  
Environment  
Tulsa, OK

Neighbors in Need  
Englewood, OH

Oak Ridge Environmental  
Peace Alliance  
Oak Ridge, TN

Panhandle Area Neighbors &  
Landowners (PANAL)  
Pawnee, TX

Peace Action Education Fund  
Washington, DC  
Nashville, TN

Peace Farm  
Tomball, TX

Physicians for Social Responsibility  
Washington, DC

Plymouth/Tipton Residents for  
Environmental Safety & Security  
McDermott, OH

Rocky Mountain Peace and Justice  
Center  
Boulder, CO

Snake River Alliance  
Boise, ID

Southwest Research and  
Information Center  
Albuquerque, NM

STAND of Amarillo  
Amarillo, TX

Tin Valley CARES  
Livermore, CA

Western States Legal Foundation  
Oakland, CA

Women's Action for New  
Directions  
Arlington, MA

*A national alliance of organizations working to address issues  
of nuclear weapons production and waste clean-up*

October 27, 1998

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attn: Mr. Stephen Sohinki  
PO Box 44539  
Washington, DC 20026-4539

RE: Comments on the Draft Environmental Impact Statement for  
the Production of Tritium in a Commercial Light Water Reactor (Draft  
CLWR EIS)

Dear Mr. Sohinki:

These comments are submitted by the Alliance for Nuclear Accountability (ANA). ANA is a national network of more than 30 organizations working to address issues of nuclear weapons production and waste cleanup. ANA groups have been directly affected by contamination problems caused by past tritium production as well as effects of nuclear weapons production.

ANA has two major concerns about the DEIS. First, ANA opposes any renewed tritium production for nuclear weapons. Thus, we oppose all of the alternatives included in the DEIS -- both producing tritium in civilian reactors, which are the five "reasonable alternatives" discussed, and the "no action" alternative of producing tritium in an accelerator. Second, ANA believes that the DEIS is substantially deficient as a NEPA document in its analysis of the environmental impacts, in addition to not discussing all reasonable alternatives.

ANA requests that the DEIS be withdrawn and that no decision be made to select a new tritium production source for nuclear weapons.

Regarding the "need" for tritium production, the DEIS does not demonstrate that any tritium production source is actually needed, and there has not been a valid and public debate about the size and existence of the U.S. nuclear arsenal. The DEIS's own chart (Figure S-3) shows that to maintain the START-II Stockpile tritium is not needed until 2016. Under any START-III treaty, the need for tritium would be further delayed. The DEIS itself is contradictory as to the "need." Section 1.3.3 states that tritium "must be available" by 2005 if a commercial light water reactor is

1/08.02

2/01.01

3/05.16

2(cont'd)

4/02.01

5/02.02

**Commentor No. 137: Susan Gordon (Cont'd)**

the source and that tritium "must be available" by 2007 if a linear accelerator is the source.

Any valid DEIS must discuss real alternatives -- such as not having a new tritium production source and maintaining a smaller nuclear arsenal, and complying with the treaty obligations under Article VI of the Nuclear Nonproliferation Treaty to step up the U.S. commitment to progress on nuclear arms reduction.

Regarding environmental impacts, the DEIS does not discuss the history of environmental and health problems around DOE tritium production facilities. Environmental problems, leaks, and accidents that have occurred at other tritium production sites are reasons that there are currently no U.S. tritium production plants for nuclear weapons. The DEIS does not discuss how spending billions of dollars on tritium production will divert funding from much-needed cleanup of the nuclear weapons complex.

The discussion of environmental impacts in the DEIS is also flawed. The DEIS does not fully describe that tritium-producing burnable absorber rods (TPBARs) is a new technology, so there are great uncertainties in their use, including the actual leakage rate (which could be much larger than the 1 curie per year estimate used on page C-19) and the environmental effects of handling, storing, and transporting them. The DEIS does not discuss the fact that there is no disposal site for spent fuel, so that the environmental effects of tritium production could include centuries of on-site spent fuel storage at commercial reactor site(s).

The DEIS also does not adequately discuss environmental justice issues. For example, the DEIS does not fully describe and discuss the impacts on low-income and minority populations living in close proximity (less than 15 miles) from some of the commercial reactor sites. Environmental impacts are diluted by the DEIS's usage of a 50-mile radius, when water and air contamination problems could be concentrated in areas in proximity to reactor sites.

Thank you for your careful consideration of these comments.

Yours truly,

*Susan R Gordon*

Susan Gordon  
Director

5(cont'd)

6/01.04

1(cont'd)

7/23.13

8/19.09

9/17.09

10/13.08

Comment Documents

Commentor No. 138: Linda King

161 Caliente Dr.  
Hoover, AL 35226  
Oct. 24, 1998

Commercial Light Water Reactor Project Office  
P.O. Box 44539  
Washington, DC 20026-4539

Dear Mr. Sohinki:

I have been reading material concerning the proposed tritium plant in the state of Alabama. I am quite concerned. As careful as anyone would try to be working with this product, accidents, no doubt, would still occur. I do not want my beautiful state to be ruined.

I feel sure you are aware of the negative possibilities, such as it being a radioactive form of water. That's a scary thought! Also, air emissions, cancer, discharge into rivers, transportation of the substance - all of these outweigh the formation of new jobs.

1/15.03

2/14.04

Commentor No. 138: Linda King (Cont'd)

Jobs are great, but at what price!

Visit our beautiful state. We want to keep it that way - safe, too.

I'm not usually a letter writer, but I may become more of one.

Please give consideration to my thoughts on the matter.

Thank you,  
Linda King

2(cont'd)

1(cont'd)

Commentor No. 139: Joseph A. Imhof

OCT 26, 1998

U.S. DEPT. OF ENERGY  
CLWR PROJECT OFC.  
ATTN: STEPHEN SOHINKI  
WASHINGTON, D.C.

DEAR STEPHEN,

JOSEPH IMHOF, HERE, I MET  
YOU AT THE RAINSVILLE<sup>AL.</sup> PUBLIC HEARING  
ON OCT. 6 OF THIS YEAR.

AS A NATIVE ALABAMIAN, I  
WANT WHAT IS BEST FOR ALABAMA.  
I FEEL THAT THE BELLEFONTE PROJECT  
WOULD BE HARMFUL TO OUR ENVIRON-  
MENT IN MANY WAYS. THEREFORE,

1/10.03

Commentor No. 139: Joseph A. Imhof (Cont'd)

(2)

SPEAKING FOR MYSELF ONLY, I  
CANNOT SUPPORT THIS PROJECT. I  
RECOMMEND THE "NO ACTION"  
OPTION.

IF I COULD ~~SPEAK~~ FOR THE  
PEOPLE OF ALABAMA, (AND THESE PEOPLE  
FULLY UNDERSTOOD THE CONSEQUENCES  
OF THIS PROPOSED BELLEFONTE PROJECT)  
I WOULD UNEQUIVOCALLY SAY THAT  
THE PEOPLE OF ALABAMA DON'T  
WANT THIS PROJECT.

PLEASE CONSIDER THE "NO

1(cont'd)

2/04.01

Commentor No. 139: Joseph A. Imhof (Cont'd)

③

ACTION" OPTION AND PRESERVE  
THE SCENIC BEAUTY AND PASTORAL  
SETTING OF THIS BEAUTIFUL AREA.

2(cont'd)

THANK YOU VERY MUCH FOR  
YOUR ATTENTION TO THIS REQUEST.

SINCERELY,

JOSEPH A. IMHOF



256-880-1019

E-MAIL debhof@juno.com

Commentor No. 140: Robert E. Eigelsbach**IRON WORKERS LOCAL UNION NO. 704**

INTERNATIONAL ASSOCIATION OF BRIDGE, STRUCTURAL, ORNAMENTAL AND REINFORCING IRON WORKERS  
2715 BELLE ARBOR AVENUE CHATTANOOGA, TENNESSEE 37406

MELVIN L. BREWER  
Business Manager

423 / 622-2111 423 / 622-2112



October 28, 1998

Mr. Bill Richardson  
U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
PO Box 44539  
Washington, DC 20026-4539

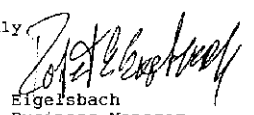
Dear Mr. Richardson:

I would like to take this opportunity to thank you on behalf of our entire membership for your visit and reception at Bellefonte Nuclear Plant regarding the Tritium Project under consideration at the site.

Our membership believes that tritium production is essential for the defense of this great nation we live in. But as I mentioned in our brief conversation, that as builders by profession, this plant still remains as "unfinished business" to a large percentage of our membership who has worked there at one time or another. I myself started a career as an Iron Worker over 20 years ago at Bellefonte Nuclear Plant, as we all have grown and progressed over the years this plant continues to remain idle.

Again on behalf of our membership, we urge you to select this site so our blood, sweat and tears that we as builders put in this project will not be for nothing.

Yours truly

  
Robert E. Eigelsbach  
Assistant Business Manager  
Iron Workers Local Union 704

REE:cjc

1/07.03



Commentor No. 141: Mike Woloszyn

Comments Received via "800" Number

Date:	Nov. 3, 1998
Name:	Mike Woloszyn
Organization:	
Address:	
Phone #:	302-832-3344
Fax #:	
Comment #:	

Comment:

My wife and my mother-in-law both live in the Scottsboro area and I just wanted to tell you that I support the Bellefonte unit and everybody there that I've talked to believes that it is a safe use for the area. It would be a good plus for the economy and it makes economic sense to use that facility instead of building one from scratch. The benefits for the average American taxpayer are enormous and once again, I fully support the use of this facility. Thank you.

1/07.04

2/23.13

Commentor No. 142: James H. Lee



**United States Department of the Interior**

**OFFICE OF THE SECRETARY**  
**OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE**  
Richard B. Russell Federal Building  
75 Spring Street, S.W.  
Atlanta, Georgia 30303

September 29, 1998

ER-98/546

U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
Attention: Mr. Stephen Sohinki  
P.O. Box 44539  
Washington, D.C. 20026

**RE: DEIS for the Production of Tritium in a Commercial Light Water Reactor**

Dear Mr. Sohinki:

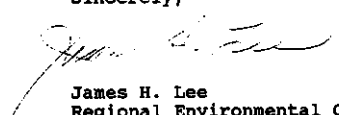
The Department of the Interior has reviewed the referenced Draft Environmental Impact Statement (DEIS) and offers the following comments.

The DEIS discusses the impacts associated with the production of tritium in existing Commercial Light Water Reactors owned by the Tennessee Valley Authority (TVA). The installations being considered are the Watts Bar Unit 1, in Rhea County, TN; Sequoyah Units 1 and 2, Hamilton County, TN; and Bellefonte Units 1 and 2, Jackson County, AL. The proposed tritium production will not involve new construction or significant increases in tritium discharges beyond those already permitted in the Tennessee River. The Fish and Wildlife Service previously provided a current list of federally threatened and endangered species which occur in the area. The DEIS incorporated consideration of impacts to those species and concluded the operation would not adversely impact those species. The Fish and Wildlife Service does not anticipate adverse effects to listed species from the proposal. TVA is committed to an extensive environmental monitoring program which would be conducted during operations. Should the monitoring indicate an adverse impact on listed species, TVA would immediately initiate consultation with the Fish and Wildlife Service regarding those impacts.

1/14.06

Please contact me at 404-331-4524 if you should have any questions.

Sincerely,

  
James H. Lee  
Regional Environmental Officer



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

October 27, 1998

4EAD/rkm

Mr. Stephen Sohinki  
U.S. Department of Energy  
Commercial Light Water Reactor Project Office  
P.O. Box 44539  
Washington, D.C. 2006-4539

SUBJECT: Draft Environmental Impact Statement (DOE/EIS-0288D) for the  
*Production of Tritium in a Commercial Light Water Reactor*

Dear Mr. Sohinki:

We reviewed the subject Draft Environmental Impact Statement (DEIS) in accordance with Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The proposed action is to obtain irradiation services from one or more Commercial Light Water Reactors (CLWRs) to provide tritium in sufficient quantities to support the nation's nuclear weapons stockpile requirements.

The proposed action includes fabricating tritium-producing burnable absorber rods (TPBARs) at a commercial facility; irradiation of the TPBARs at one or more of five operating or partially constructed TVA nuclear reactors; the possible completion of TVA's nuclear reactors; transportation of non-irradiated TPBARs from the fabrication facility to the reactor sites, irradiating TPBARs in the reactors and transporting irradiated materials from the reactors to a tritium extraction facility that DOE would establish at the Savannah River Site in South Carolina; and management of spent nuclear fuel and low-level radioactive waste. Overall, the DEIS is comprehensive and detailed. The Summary document provides a concise synopsis. Our comments on the DEIS are attached.

EPA has environmental concerns about the project; in particular, the Final EIS should provide more detailed information about the comparative costs of the tritium production alternatives, processes, and potential environmental impacts.

1/23.16

Commentor No. 143: Heinz J. Mueller (Cont'd)

Thank you for the opportunity to review this DEIS. Based on our review, we rate the DEIS "EC-2", that is, we have environmental concerns about the project, and more information is needed to fully assess the impacts. If you have questions, please contact Ramona McConney of my staff at (404) 562-9615.

Sincerely,

Heinz J. Mueller, Chief  
Office of Environmental Assessment

Attachment

**Commentor No. 143: Heinz J. Mueller (Cont'd)**

Comments for  
Draft Environmental Impact Statement (DEIS) for the  
Production of Tritium in a Commercial Light Water Reactor

**GENERAL COMMENTS:**

1. DOE should be explicit concerning the costs associated with tritium production at each TVA plant considered. Please provide a comparison of engineering requirements and costs associated with using existing reactors vs. use of a new reactor. || 1(cont'd)
2. The completion of Bellefonte Nuclear Plant(s) should be a separate EIS. Unless solely used for tritium production, this EIS should not suffice as a dual one for the completion and commercial operation of the Bellefonte plant(s). || 2/05.06
3. Data from the final report from the test phase currently ongoing at Watts Bar should be reviewed and analyzed before a final EIS is completed for this CLWR project. Uncertainties related to burnup, reactor physics, and other factors should be more adequately assessed by DOE at that time. || 3/05.10
4. Will the emissions from the tritium produced be covered under the Clean Air Act - NESHAP-Radionuclides [10 CFR 61, subpart H]? Although a minor contributor to the air emissions from a Nuclear Plant, nevertheless the tritium is owned by DOE. || 4/11.05

**SPECIFIC COMMENTS:**

- P.1-12, Sec.1.5.1.2: Please provide the report that discusses the findings or lessons learned from the Lead Test Assembly demonstration. When will the post-irradiation exam be conducted? || 3(cont'd)
- P.3-2, Sec.3.1.2: States the tritium produced would be chemically bound to the "getter" and extracted only after heating to a high temperature. Is there no release potential of any form of tritium, such as elemental or tritium oxide, that contributes to the 0.2 mrem/yr for 1000 TPBARs, for example? Is the only tritium added to waste and releases related to the nuclear process itself? || 5/19.10
- P.3-9, 4th bullet: States that the tritium production "would not be expected to affect the radiological condition of the reactor..." Will the results of the trial test at Watts Bar provide the adequate evidence required to better predict what will happen in the core, the reactor life, etc.? What will be the effect on the reactor physics itself? How different from using the regular burnable absorber rods? || 3(cont'd) || 6/24.15
- P.5-99, Sec.5.2.7: What is the current U-235 enrichment, 4.0%? Why would DOE supply the higher enriched uranium, and not the U.S. Enrichment Plants? Is it because of the uranium surplus at DOE? || 7/24.04
- Also, the text states that the environmental impacts "would be minimal" from increasing the enriched uranium use in the reactor. How does this compare with the H-3, in liquid/air releases? DOE should quantify this statement. || 8/14.17

**Commentor No. 143: Heinz J. Mueller (Cont'd)**

- P.A-12, 1st Paragraph: The text does not go into any detail about the differences between using TPBARs instead of burnable poison rods. Is this discussed elsewhere? If so, it should be referenced here. If not, please provide more detail. || 9/19.11

Commentor No. 144: Anonymous (5)

## Comments Received via "800" Number

Date:	Nov 13, 1998
Name:	Unknown
Organization:	
Address:	"North Alabama"
Phone #:	
Fax #:	
Comment #:	

## Comment:

I am a citizen of North Alabama. I do not want the publicity. I am not in favor of a tritium plant in Jackson County. Thank you. || 1/07.03

Commentor No. 145: Herbert L. Harper

TENNESSEE HISTORICAL COMMISSION  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
2941 LEBANON ROAD  
NASHVILLE, TN 37243-0442  
(615) 532-1550

September 1, 1998

Mr. Stephen M. Sohinki  
Office of Reconfiguration  
Department of Energy  
Washington, DC 20585

RE: DOE. TRITIUM/COMMERCIAL LIGHT WATER. UNINCORPORATED. MULTI COUNTY

Dear Mr. Sohinki:

The Tennessee State Historic Preservation Office has reviewed the above-referenced undertaking received on Tuesday, August 25, 1998 for compliance by the participating federal agency or applicant for federal assistance with Section 106 of the National Historic Preservation Act. The Advisory Council on Historic Preservation has codified procedures for implementing Section 106 of the Act at 36 CFR 800 (51 FR 31115, September 2, 1986).

After considering the documentation submitted, it is our opinion that the undertaking will have no effect upon National Register of Historic Places listed or eligible properties. This determination is made either because of the location, scope and/or nature of the undertaking, and/or because of the size of the area of potential effect; or because no listed or eligible properties exist in the area of potential effect; or because the undertaking will not alter any characteristics of an identified eligible or listed property that qualify the property for listing in the National Register or alter such property's location, setting or use. Therefore, this office has no objections to your proceeding with the project.

If you are applying for federal funds, license or permit, you should submit this letter as evidence of compliance with Section 106 to the appropriate federal agency, which, in turn, should contact this office as required by 36 CFR 800. If you represent a federal agency, you should submit a formal determination to this office for comment. You may direct questions or comments to Joe Garrison (615)532-1559. This office appreciates your cooperation.

Sincerely,

Herbert L. Harper  
Executive Director and  
Deputy State Historic  
Preservation Officer

HLH/jyg

1/14.06

**Commentor No. 146: Mary Lou Blazek**



**Oregon**

John A. Kitzhaber, M.D., Governor

**Department of Consumer and Business Services**

*Office of Energy*  
625 Marion St. NE, Suite 1  
Salem, OR 97301-3742  
Phone: (503) 378-4040  
Toll Free: 1-800-221-8035  
FAX: (503) 373-7806

Web site: [www.cbs.state.or.us/external/oeo/](http://www.cbs.state.or.us/external/oeo/)

October 5, 1998

Mr. Jay Rose  
Office of Defense Programs  
US Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

Re: Oregon Office of Energy's comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor.

Dear Mr. Rose,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor (CLWR EIS). Tritium production is a subject Oregonians have strong feelings about. Our most urgent concerns are:

The CLWR EIS mentions numerous times that production of tritium in a commercial light water reactor may result in more spent fuel. As also detailed in the CLWR EIS, this fuel will have higher enrichments and lower burnup than fuel currently discharged to the spent fuel pools and thus will have higher reactivity. The CLWR EIS discusses in detail the use of Independent Spent Fuel Storage Installations (ISFSI), but it is presumed that some of this more reactive fuel will be discharged to the facility spent fuel pool. The CLWR EIS contains no discussion of the effects of this high reactivity fuel on spent fuel pool design parameters or spent fuel pool or fuel handling accidents. We recommend that a detailed analysis of the effects of this high reactivity fuel on the various plants' spent fuel pools, and on fuel pool and fuel handling accident analyses be done and a discussion of the results included in the CLWR EIS.

1/17.10

There is no discussion of the effect of this high reactivity fuel on the postulated geologic repository. For example: Since there will be much more spent fuel generated by this process, will this affect the capability of the geologic repository to accept fuel from other CLWR? Will its high reactivity make it ineligible for geologic storage or require special handling? These issues should be evaluated and discussed in the CLWR EIS.

2/17.11

**Commentor No. 146: Mary Lou Blazek (Cont'd)**

Attached are additional specific comments. Should you have any questions, please contact Doug Huston of my staff at (503)378-4456.

Sincerely,

Mary Lou Blazek  
Administrator  
Nuclear Safety Division  
Oregon Office of Energy

cc: Ms. Donna Powauke - Nez Perce Tribe  
Mr. J. R. Wilkerson - CFUIR  
Mr. Michael Wilson - Washington Ecology  
Mr. Douglas Sherwood - EPA  
Mr. Russell Jim - Yakama Nation

**Commentor No. 146: Mary Lou Blazek (Cont'd)****Oregon Office of Energy's comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor Page 1 of 4.**

Section 4.2.1.9 discusses "conservative assumptions" used for both individual and population exposure times. We recommend that these conservative assumptions be expressly discussed in the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor (CLWR EIS).

**3/14.18**

Table 4-10 refers to a footnote "c." Footnote "c" does not exist. It appears that footnote "d" is correct. This table needs to be corrected.

**4/24.12**

Table 4-11 does not contain any reference to the source of the data in the table. We recommend that a citation as to the source of the data, for example, exposure records, be included with Table 4-11.

**5/24.16**

The Low Level Radioactive Waste section on page 4-28 implies a difference between the primary coolant system and the reactor coolant system. In reality these are one and the same system. We recommend that consistent terminology be used in this section.

**4(cont'd)**

Section 4.2.2.1 refers to Chickamauga Lake, Figure 4-7 refers to Chickamauga Reservoir. These references need to be consistent.

The Aquatic Resources Section on page 4-42 discusses a decline in the native mussel population but does not discuss a suspected cause. We recommend that this suspected cause be included in this section.

**6/12.06**

The discussions of socioeconomic impact are very inconsistent between sites. These discussions need to be to the same level of detail for each site.

**7/13.04**

The first assumption listed in Section 5.1.2 is not an assumption; it's a statement concerning the conservatism of the model used. Move this statement from the list of assumptions up into the paragraph, which precedes the list of assumptions.

**8/24.17**

The statement in the fourth assumption of Section 5.1.2 that experience with boron burnable absorber rods bounds what would be expected from Tritium Production Burnable Absorber Rods (TPBAR) needs more amplification. There are several types of boron burnable absorber rods with different materials of construction. The number of boron burnable poison rods installed in a core is much less than the possible number of TPBARs that would be installed for tritium production.

**9/19.01**

Section 5.2.1.1 under Land Use states no additional land would be disturbed at Watt's Bar to prepare for tritium production but then goes on to discuss construction of a dry cask spent nuclear fuel storage facility at the site. We recommend that the first sentence be modified to acknowledge the possible construction of a dry cask spent nuclear fuel storage facility.

**4(cont'd)****Commentor No. 146: Mary Lou Blazek (Cont'd)****Oregon Office of Energy's comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor Page 2 of 4.**

Section 5.2.1.9.1 makes the statement no new facilities would be constructed to support tritium production at Watt's Bar. Construction of a dry cask spent nuclear fuel storage facility constitutes new facilities. We recommend that this possibility be acknowledged in any discussion of construction impacts in the CLWR EIS.

**4(cont'd)**

Section 5.2.1.9.2 under Radiological Impacts states assessment of dose and associated cancer risk to the non-involved worker is not applicable for beyond-design-basis accidents. The rationales given following this statement are of dubious validity. The assumption of a slow moving accident is not a general case; many scenarios of fast moving beyond basis accidents exist. Further, the statement is made that the public within 10 miles would have been evacuated. This evacuation would not occur immediately and would most likely take hours to accomplish. We recommend that dose and associated cancer risk be evaluated for the non-involved worker.

**10/15.09**

Table 5-6 presents risk increments associated with various accidents, and the paragraph following this table describes these numbers as the actual risk. Terminology should be consistent between narratives and tables.

**11/15.10**

The statement on page 5-39 that studies of natural draft cooling towers in England approximate the performance of natural draft cooling towers in the southern US needs amplification. There are significant climate differences between these two areas.

**12/11.06**

Footnote "e" to Table 5-22 appears redundant.

**4(cont'd)**

The footnotes associated with Table 5-29 are out of synch with the table.

Table 5-30 does not include health risks to workers. The assumption that administrative controls will completely protect workers is unrealistic. The Oregon Office of Energy recommends that as a minimum, historical exposures for workers in similar processes, with administrative controls in place, be reviewed and the risks then extrapolated.

**13/14.01**

Table 5-32 assumes mean (50%) meteorological conditions to the maximally exposed offsite individual. We recommend that worst case credible meteorological conditions be used to bound the risks.

**14/15.11**

Table 5-32 does not give units for the data presented. We recommend these units be provided in the table.

**15/24.20**

Table 5-38, Uranium Fuel Cycle and Waste Management entry discusses only transportation. Issues associated with additional on-site storage capacity for spent fuel should also be discussed.

**16/17.12**

**Commentor No. 146: Mary Lou Blazek (Cont'd)**

**Oregon Office of Energy's comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor Page 3 of 4.**

Section 5.2.6, page 5-92 discusses the exposure to a "real" individual. Information should be included on what is meant by placing the word real in quotes. || 17/24.23

Include the assumptions behind the conservatively estimated dose to a worker from the Independent Spent Fuel Storage Installation (ISFSI). (page 5-94, top of the page.) || 18/17.13

Page 5-94, second paragraph states no chemical, biocide or sanitary wastes would be generated in the operation of the ISFSI. This disagrees with Table 5-41, which implies that small amounts of these would be generated. These two references should be consistent. || 19/17.14

Table 5-42, page 5-96, the bottom of the table is cut off. || 4(cont'd)

The table on the top of page 5-97 has no title, is not referred to anywhere in the text, and generally contains no useful information. We recommend this table be deleted. ||

The transportation segments discussed in section 5.2.8 (page 5-100) do not include transportation of raw materials to the TPBAR fabrication facility. This phase of transportation should also be discussed. || 20/18.12

The Table 5-46 assumption of a one month refueling outage is optimistic. We recommend that the TVA average refueling outage duration be used in this column. || 21/14.19

Section 5.2.9 refers to a "baseline tritium production CLWR configuration" which it says is described in Sections 5.2.1 to 5.2.3. These sections consider two conditions: 1000 TPBARS and 3400 TPBARS. Table 5-46 identifies the baseline as 3400 TPBARS, but it is not apparent that this is the baseline assumed in Table 5-47 since some of the "change from baseline" columns for this case are non-zero. The baseline assumed in this section needs to be stated explicitly, and all the tables in this section should be checked for consistency with this baseline. || 22/24.18

Tables 5-51 and 5-53 do not consider two reactors operating in the tritium production mode even though these options are possible as discussed in Table 3-2. The two reactors in tritium production configuration should be added to these tables. || 23/24.13

The following typographical or grammatical errors were discovered:

Summary, page 6 top of page, second sentence contains a split infinitive – "to not be.." should be "not to be..." || 4(cont'd)

Page 3-10, second bullet, fourth sentence, replace "of" with "at" just prior to "a national repository."

Page 3-29, Low Level Radioactive Waste Generation, first sentence. Add the word "at" prior to Bellefonte 1.

**Commentor No. 146: Mary Lou Blazek (Cont'd)**

**Oregon Office of Energy's comments on the Draft Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor Page 4 of 4.**

Typographical and grammatical errors (cont.)

Page 4-12, 4-13, the last two full sentences on page 4-12 are repeated on the top of page 4-13.

Page 5-1, Section 5.1, first sentence. Add the word "to" following the abbreviation CEQ.

Page 5-31, Section 5.2.3.2, second paragraph, first sentence. Add the word "by" following the phrase "compensated for..."

Page 5-98, last sentence on the page. Insert the word "no" prior to the word "additional."

Page 5-105, TBAR should be TPBAR

Page 5-105, Section 5.2.10, second sentence. The word "characterizes" should be "comprises."

Page 5-120, first full paragraph at the top of the page, second sentence. This sentence should be re-written. A suggestion is "Due to the limited amount of land disturbance, there would be small impacts...."

Page C-8, the paragraph following Table C-2. The radiation unit Grey is improperly abbreviated Cy.

4(cont'd)

***The following commentors (200 through 255) submitted comments concerning the December 14, 1998, public meeting and TVA's latest proposals to DOE for use of Watts Bar, Sequoyah, and Bellefonte.***



**Commentor No. 200: Mrs. Ed Houser****Comments Received via "800" Number**

<b>Date:</b>	Dec 10, 1998
<b>Name:</b>	Ms. Ed Houser
<b>Organization:</b>	
<b>Address:</b>	46 Sherry Drive Ringo, GA 30736
<b>Phone #:</b>	(706) 866-7239
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am totally against opening a plant in Hollywood, Alabama at the Bellefonte plant. Those people down there have enough trouble as it is. There's not enough educated people to run that--they would have to be bringing people in to run it. There's not enough housing for people to be brought in. It is mostly a farm community. Lots of older folks and younger folks, not a whole lot in between. But this plant does not need to be in Bellefonte because it will create nothing but trouble.

1/13.01

**Commentor No. 201: W. D. Scarbrough****Comments Received via "800" Number**

<b>Date:</b>	December 10, 1998
<b>Name:</b>	W.D. Scarbrough
<b>Organization:</b>	
<b>Address:</b>	3503 Sparkman Drive, NW Huntsville, AL 35810
<b>Phone #:</b>	(256) 852-9350
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

Comment on tritium production at Tennessee Valley. I feel it would be highly desirable. I do feel like part of your message is not getting out because I have not seen one reference in any public publication, newspaper or television report, radio report, otherwise of the fact that all you will be doing in the Tennessee Valley is exposing control rods to radiation and you will transport the control rods somewhere else to extract tritium. I feel like it will be highly desirable to have that situation here because we already are producing atomic electricity--we might as well get some other benefit from it as tax benefits.

1/07.07

**Commentor No. 202: Robert Van Wyck****Comments Received via "800" Number**

<b>Date:</b>	Dec. 15, 1998
<b>Name:</b>	Robert Van Wyck
<b>Organization:</b>	
<b>Address:</b>	709 Helmsdale Place North Brentwood, TN 37027
<b>Phone #:</b>	(615) 373-9176
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I don't want any of the options. My problem is you notified me on Friday of a meeting that's being held at the Rhea County High School in Evansville today. There's no way I can make that on such a short schedule. I tried to fax a letter in to Sohinki asking in the future at least 2 weeks notice but your fax machine is not working. I don't know why. I tried for the last 24 hours so please check your fax machine and try to schedule these meetings so people have time to get there to make discussion.

1/07.02

2/05.31

*(Mr. Van Wyck's comments were received, see Commentor No. 247)*

**Commentor No. 203: Angela Heckler****Comments Received via "800" Number**

<b>Date:</b>	Dec. 17, 1998
<b>Name:</b>	Angela Heckler
<b>Organization:</b>	
<b>Address:</b>	983 County Road 213 Hollywood, AL 35752
<b>Phone #:</b>	(334) 499-2380
<b>Fax #:</b>	
<b>Comment #:</b>	

**Comment:**

I am calling in reference to the Bellefonte Nuclear Plant producing tritium--we are against it. We feel like this is being pushed upon us. The polls that have been taken have not been taken fairly. It will affect us and we do not want it here. I don't know where the people are getting their information that says that Jackson County does want this because everyone I talk to say they do not want it and we would like to make that clear. Just wanted to make the comment and let someone know that we are not for this. We are against it and we do not want it in our community.

1/07.03

**Commentor No. 204: Carol L. Womacks**

AddressID: 56 Date Updated: 12/16/96 1:22:03 AM  
First Name: MI: Last Name: Title:  
carol womacks  
Organization: Bellefonte Alliance  
Address: 204 County Rd. 402  
City: Scottsboro  
State or Province: AL Postal Code: 35768 Country: Jackson  
Work Phone: Fax Number:  
Email Address: womacks@HWAAY.net Home Phone: 256)574-2808

Notes: I would like to say that the majority of citizens of Jackson County do not want the Bellefonte plant put onto operation. That of course not what the elected officials, business owners, and union people from Tennessee want you to think. People in Jackson county are concerned if they will loose jobs. business owners will loose business. I know that the man who ran against our Mayor lost his job working for the city of Scottsboro and this was after many good job reviews prior to his running for Mayor. And you wonder what I am telling you is true? I only wish you would take time to remember that all who came to the meetings were people who would profit from the Bellefonte option and not one average citizen was for the Bellefonte option. Please take this into consideration and do the right thing for the people of Jackson County by not selecting our Bellefonte plant as the place to produce tritium. Thank you

1/07.03

**Commentor No. 205: William L. Stiles**

AddressID: 57 Date Updated: 12/18/96 2:34:08 PM  
First Name: MI: Last Name: Title:  
William L Stiles Elect. Maint. Foreman  
Organization: TVA SEQUOYAH  
Address: 3216 SCENIC DR.  
City: SCOTTSBORO  
State or Province: AL Postal Code: 35769 Country: U.S.  
Work Phone: 423-843-8574 Fax Number:  
Email Address: wlstiles@tva.gov Home Phone: 256-259-0554

Notes: I'VE BEEN IN TVA POWER PLANT MAINTENANCE FOR THE LAST 24 YR'S. 20 YR'S OF THIS TIME OF THIS TIME HAS BEEN AT BELLEFONTE FOR 10 YR'S AND THE LAST 10 YR'S AT SEQUOYAH NUCLEAR PLANT. TVA HAS GOOD NUCLEAR PLANTS BUT BELLEFONTE IS THE BEST BUILT, DESIGNED AND WILL HAVE AN OPERATING LIFE OF 40 YR'S. ECONOMICALLY BELLEFONTE IS THE BEST DEAL AND THE PEOPLE OF JACKSON COUNTY WANT DOE!!!

1/07.03

**Commentor No. 206: Silas M. Booker**

Address/D: 58 Date Updated: 12/19/98 7:51:25 AM

First Name: Silas MI: M Last Name: Booker Title:

Organization:

Address: 1325 Torbett Road

City: Spring City

State or Province: Tn Postal Code: 37381 Country: USA

Work Phone:  Fax Number:

Email Address: Suedoname1@AOL.COM Home Phone:

Notes: Tritium production should be confined to DOE owned reactors. To do otherwise would confuse the distinction of Commerical uses and weapon uses of nuclear power. It would weaken the US stand that countries should not use their utility reactors for weapons production.

1/01.09

**Commentor No. 207: Judith Cumbee****Comments Received via "800" Number**

Date:	Dec. 14, 1998
Name:	Judith Cumbee
Organization:	
Address:	11076 County Road Lanett, AL 36963
Phone #:	(334) 499-2380
Fax #:	
Comment #:	

**Comment:**

I am the Chair of the Peace-Justice Human Rights Committee of Alabama New South Coalition. I have been out of town. I got a message Thursday afternoon about this "Public Hearing" Monday night, the 14<sup>th</sup>. I am leaving for Atlanta tomorrow. I have a sick daughter. There's no way I can be in Tennessee, but number one, I am chagrined that we would get information at such a last minute about a matter that has to do with producing tritium in either Tennessee or in Alabama--that is outrageous. We need to have a good long advance notice. How would one of the Secretaries of Energy or anybody else be able to plan something at the last minute? I have sent in my comments before about my opposition to tritium production. We need to be doing away with our nuclear weapons. We are accusing Iraq of weapons of mass destruction and here we are proceeding with tritium. Absolutely outrageous. I totally oppose it and I won't go on, as I said, you have my written comments but I think having this meeting at the last minute is totally wrong and if you want to try to get a full accurate kind of response from the public, you need to set another meeting in January. So, in spite of our differences over this, whoever might hear this message, or maybe you even agree with me, I wish you, ...what, Season's Greetings which means that I hope the people of the world can come together and create a world where we can live together and set a plan to try not to annihilate us all and we can find ways of peace and it's not through building up these kinds of weapons.

1/05.31

2/01.01

1(cont'd)

2(cont'd)

**Commentor No. 208: Jim Snell**

AddressID: 55 Date Updated: 12/11/98 5:24:43 PM  
 First Name: Jim MI:  Last Name: Snell Title:   
 Organization:   
 Address: 301 Scott Ave  
 City: Nashville  
 State or Province: TN Postal Code: 37205 Country: USA  
 Work Phone: 615-322-4848 Fax Number: 615-343-0325  
 Email Address: james.e.snell@vanderbilt.edu Home Phone: 615-226-1365

Notes: As a concerned citizen of Middle Tennessee, I believe that tritium production in commercial light water reactors (CLWR) would be a tremendous mistake on several fronts. First of all, I have safety concerns for the workers and community members around the proposed sites. I understand that DOE believes that this technology is safe, but it is still a relatively untried procedure. Second, I believe that resuming tritium production sets a conflicting goal to those of strategic arms reduction. The need assessments set forth by the DOE seem to ignore current reductions activities as well as those required by strategic arms reduction treaties the United States has signed into law. Third, and most importantly, I believe that the use of a commercial reactor for military purposes sets an extremely bad example and precedent. The United States can only expect other nations to follow our example and use their civilian facilities for military purposes. The hypocrisy is clear, and we can not reasonably expect other countries to keep civilian and military separate while we happily churn out bomb material in a CLWR.

1/14.04

2/02.01

3/01.09

It appears that the DOE and TVA have already struck a deal to produce tritium regardless of the concerns of community members such as myself. I hope, however, that this is not the case and that the DOE will reconsider its desire to resurrect the Cold War era bomb machine. It simply is not needed and will waste untold billions of taxpayer money. Please do not proceed with the Commercial Light Water Reactor project.

4/05.33

2(cont'd)

5/23.13

Yours Truly,  
Jim Snell

**Commentor No. 209: Mike Crane**



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
 to Leaving the Meeting

Comments: I AM IN FAVOR OF THE BELLERIVE Proposal. 1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional) MIKE CRANE  
 Organization:   
 Address: 315 LEVINE LANE  
 City: SPRING CITY State: TN Zip Code: 37381  
 Work phone: 423 265 3633 Home phone:   
 Fax:   
 E-Mail Address: MLCRANE1@JUNO.COM

12/10/98

Commentor No. 210: Robert L. Davis



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I support any of the Bellefonte options, it is the best for the country and by far the best utilization for the American taxpayer. Any other option threatens the bridge at TVA. Electricity production makes no social economic benefit for the local area or utilizes Federal assets. DOE has opportunity to make a wise yet positive choice and any other option is a bait term board!

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Robert L. Davis  
Organization: TVA  
Address: 1140 Bessemer Rd. NW  
City: Huntsville State: AL Zip Code: 35891  
Work phone: (256) 524-8410 Home phone: (256) 534-2224  
Fax: (256) 524-8791  
E-Mail Address: RLDavis@tva.gov, RLCDavis@aol.com

12/10/98

Commentor No. 211: Cheryl A. Dyer



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: The East Tennessee area is overflowing with toxic materials from hazardous waste operations. Both in local industry and DOE operations. East Tennessee cannot handle any more toxic wastes, emissions or accidents. The people of the Bellefonte area are willing to host this new facility. Consideration should be given first to this site. There are many illnesses believed to have been caused by the DOE nuclear operations across the country. East Tennessee has three nuclear facilities that have contaminated the air, soil and water. We do not need another nuclear facility to add more burden on an already sick environment and population. Even if an "accident" did not occur over the next 25 years at Watts Bar/Sequoyia, the contamination issues are of grave concern and require serious consideration. Tritium poses a nuclear danger and the contamination issues possible should not be placed in this area. There are just too many environmental and population concerns with adding yet another nuclear facility to the East Tennessee area.

1/10.04

2/07.03

3/08.02

1(cont'd)

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Cheryl A. Dyer - Disabled worker from DOE's K-25 Site  
Organization: Coalition for a Healthy Environment  
Address: 1100 Madison Hill Ct  
City: Clinton State: TN Zip Code: 37716  
Work phone: Home phone: 423/457-8322  
Fax: 423/457-8150 (call home # first)  
E-Mail Address: CherylDyer@yahoo.com

12/10/98

Commentor No. 212: Linda Ewald

Dec. 14, 1998



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I would like to protest the short notice of this meeting - many interested persons did not hear about the meeting or had to wait to attend because of other commitments. Also, the ~~the~~ deadline for the decision making to be made ~~was~~ before the end of the year (12/31/98) was concerning. Such an important decision should not be rushed and there is not time for all who wish to comment by phone, letter and otherwise. Also due to short notice, I am opposed to the production of tritium for nuclear weapons in waste for or any commercial nuclear reactor. This violates U.S. nonproliferation policy and the Nuclear Nonproliferation Treaty. ~~that~~ The United States would protect this action in any other country - let them abide by the same rules made for the whole world. I question the statement that tritium is not a serious nuclear material (exactly what is a serious nuclear material?) Tritium is highly radioactive and ~~is~~ harmful to human health and the environment and should not be produced on purpose. ~~It~~ also ~~is~~ as a ~~strong~~ electrostatic power and a ~~fast~~ power, I protest being forced to pay for production of weapons material with electric bill and taxes. And finally the choice between tritium production in a commercial reactor or lower accelerator is an arbitrary decision and should not be forced. The wisest and most

Thank you for your input. Please use additional sheets if necessary and attach them to this form.  
Don't forget to include U.S. reduction of nuclear weapons stockpile.  
Name: Linda Ewald  
Organization: Oak Ridge Environmental Peace Alliance / Thrasher Center for  
Address: 448 Ponder Road  
City: Knoxville State: TN Zip Code: 37924  
Work phone: Home phone: Fax: E-Mail Address:

1/05.31

2/01.12

3/01.01

4/01.04

5/01.13

6/14.04

7/10.03

8/23.13

3(cont'd)

3(cont'd)

Commentor No. 213: Patty Fagan



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: where has TRITIUM been produced? what has the studies shown to the environment? We the people (Mothers esp) worry about the environment our water, food is unsafe here, we do not want risk even in the release. I do not want the same type thing to happen to the Ohio.

1/08.03

2/14.04

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Patty Fagan  
Organization: Mother Res. Homeowner  
Address: 4995 Blythe Ferry Rd  
City: Dayton State: TN Zip Code: 37321  
Work phone: 423 269 5812 Home phone: Fax: E-Mail Address:

Commentor No. 214: Ronald L. Forster**COMMENT FORM**

Please Turn in Your Written Comments

12/14/98

**PRIOR**

to Leaving the Meeting

Comments: I Am opposed to the Sole Production of Tritium @ WBN and SW. Are the following reasons:

- ① Operating the units as high leakage cores for tritium production which would possibly reduce the operating life of these units by ~~10-15~~ years; thus removing these highly needed sources of electricity production. No P.O.T.
- ② The starting and operation of Bellefonte for the production of electricity and Tritium is the most logical ~~and~~ decision.

③ Another source of electricity for future increasing demands.

④ A portion of the sale of this electricity will pay back the tax dollars spent to produce it.

⑤ Economic Benefits for the NEAL NW GN & TN areas around the Bellefonte Plant.

It's the logically correct choice for the NEAL.

Ronald L. Forster

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Ronald L. Forster  
 Organization: Catawact, Inc. (RCM Technologies)  
 Address: 14 Hillcrest Ct  
 City: Ringgold State: GA Zip Code: 30736  
 Work phone: (706) 937 4304 Home phone: 206 937 6199  
 Fax: Catawact RE @ AOL.com  
 E-Mail Address: 71

12/16/98

1/07.08

Commentor No. 215: Erich R. Gonce**COMMENT FORM**

Please Turn in Your Written Comments

**PRIOR**

to Leaving the Meeting

Comments: Bellefonte yes - not logical and economical way to go for the NEAL. For the production of power, and the production of tritium.

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Erich R. Gonce  
 Organization: Catawact, Inc.  
 Address: 716 Mountain Creek Road Apt # 100  
 City: Catawact State: TN Zip Code: 37405  
 Work phone: (252) 546-6791 Home phone: (423) 876-8700  
 Fax:  
 E-Mail Address:

12/16/98



Commentor No. 216: Dick Hoesly

Commentor No. 217: John Johnson



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I SUPPORT ANY BELLEVILLE OPTION FOR THE PRODUCTION OF THE NATION'S TRITIUM SUPPLY.  
I FEEL THAT THESE OPTIONS ARE THE CHEAPEST FOR DOE, & THE NATION'S TRY-PAIERS. THE LIFE CYCLE COSTS FOR BELLEVILLE OPTIONS RETURN DOE MONEY THEN SHARING IN NET CASH FROM ELECTRICITY SALES.  
THE USE OF WATTS BAR WILL PROVIDE NO ECONOMIC BENEFIT TO THE AREA AROUND WATTS BAR. IT WILL ALSO PUT AT RISK BASE LOAD PLANTS WHICH TVA NEEDS FOR POWER SUPPLY.  
DURING THE CONGRESSIONAL SESSION LAST SUMMER THE ALABAMA DELEGATION & THEIR CONSTITUENTS SPEAK- HEADED THE DRIVE TO OVER TURN THE CLARKY-GRANHAM LANGUAGE. WHEN THIS LANGUAGE RETURNS AGAIN THIS YEAR WHERE WILL DOE GET THEIR SUPPORT? SUPPORT WILL NOT COME FROM AN AREA THAT DOESN'T GAIN ANYTHING.

1/07.08

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Dick Hoesly  
Organization: \_\_\_\_\_  
Address: 2905 Clemens Rd State: AL Zip Code: 35709  
City: SEATTLEBORO Work phone: \_\_\_\_\_ Home phone: 256-259-6373  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Comments of John Johnson 12-14-98

John Johnson  
PO Box 281  
Chatt TN  
37401  
423-624-3935

TO Sec. Energy Bill Richardson:  
\* The Cold War <sup>fall together now</sup> IS OVER!  
The Cold War IS OVER!  
The Cold War IS OVER!

\* We DO NOT Need more nuclear weapons — we should dismantle the ones we have. No More Nukes!

\* I oppose this tritium project (w/ TVA) — it violates the spirit, if not the letter, of the Law (CAEA + NNPT)

\* DOE makes a mess whenever it goes — Oak Ridge — Savannah — Hanford

\* By producing tritium for nukes you are not, contrary to popular opinion, preventing nuclear war — You are, in fact, making nuclear holocaust more of a certainty.

\* in short you are all slaves to the imperatives of technology and war criminals and you should resign and go camping in the wilderness with your families.

1/01.01

2/01.04

3/08.02

1(cont'd)

Comment Documents

Commentor No. 218: Larry Kuka**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: Production of nuclear weapons  
material should be done at Dept of Defense  
facilities NOT Commercial Power Plants  
generating plants.

1/01.09

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Larry Kuka  
Organization: \_\_\_\_\_  
Address: 6601 Romeo Rd  
City: Harrison State: TN Zip Code: 37241  
Work phone: 423 344 7777 Home phone: same  
Fax: 423 344 0022  
E-Mail Address: mlkpg@aol.com

12/10/98

Commentor No. 219: Mr. & Mrs Ford P. McCuisten Jr.**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I join the large majority in favoring  
the production at the Bellefonte site.  
I spent my vacation in Washington asking for  
help in the completion of that near finished plant.  
I do not favor the use of Watts Bar nor  
Sequoyah because they offer nothing positive  
to the area and off of the CLWR option we'll  
not be alive if the people of Jackson County, AL  
had not taken a firm stand.  
Please make Bellefonte the choice of DOE,  
it is clearly the choice of the people.  
Thank You

1/07.08

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Mr & Mrs Ford P. McCuisten Jr.  
Organization: International Brotherhood of Boilermakers  
Address: P.O. Box 315  
City: Dutton State: AL Zip Code: 35744  
Work phone: 256-574-8810 Home phone: 256-657-2477  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 220: Mark D. Phillippe

Commentor No. 221: Steven Sax



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I support any of the Bellefonte Options

WATTS BAR/SEC OPTIONS ARE  
TOO COSTLY AS COMPARED TO BELLEFONTE  
OVER THE LIFE OF THE PROJECT AND  
PER KILOGRAM OF TRITIUM PRODUCED.  
WATTS BAR/SEC DO NOT PRODUCE JOBS  
FOR THE VALLEY.  
WATTS BAR/SEC PUTS TVA AT RISK  
DUE ELECTRICAL BASE LOADS

*Mark D. Phillippe*

1/07.08

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): MARK D PHILLIPPE  
Organization: \_\_\_\_\_  
Address: 3002 SCENX DR  
City: SCOTTSDALE State: AZ Zip Code: 85269  
Work phone: 256-574-8713 Home phone: 256-574-3969  
Fax: \_\_\_\_\_  
E-Mail Address: MDPhillip@H.WATTS.Net

12/10/98



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I AM AGAINST THE WATTS BAR OPTION  
BECAUSE OF THE POWER RELIABILITY PROBLEMS  
USING WATTS BAR. BELLEFONTE WOULD  
BE OPERATED AS A DOE REACTOR UNIT AND  
ANY OUTPUT OF ELECTRICITY WOULD BE  
PRODUCED BY TVA. DOE COULD MAKE  
THE DECISIONS ABOUT HOW THE UNIT  
WOULD BE OPERATED. WATTS BAR MUST  
BE OPERATED TO TVA'S NEEDS FOR POWER  
PRODUCTION AND NOT DOE PRODUCTION  
NEEDS. IN TIMES OF POWER SHORTAGES -  
TVA MAY NOT BE ABLE TO SHUT DOWN  
WATTS BAR FOR DOE TRITIUM NEEDS.

1/07.08

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): STEVEN SAX  
Organization: East Penn Improvement Authority  
Address: PO BOX 680619  
City: East Penn State: PA Zip Code: 35969  
Work phone: (856) 845-0671 Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

COMMERCIAL LIGHT WATER REACTOR PROJECT

COMMERCIAL LIGHT WATER REACTOR PROJECT

Commentor No. 222: George E. Schmidt Jr.



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: *We do not want Watts Bar and Sequoyah used to make tritium nor do we want Bellefonte completed nor used to make tritium.* 1/07.02  
*Please send me the means I have as a citizen to prevent the making of tritium.* 2/05.21

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) *George E. Schmidt, Jr.*  
Organization: *U.S.A. Citizen*  
Address: *214 East 8th Street*  
City: *Chattanooga* State: *TN* Zip Code: *37403*  
Work phone: *423-266-1618* Home phone: *423-266-6091*  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 223: Lucy W. Taylor



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: *As a citizen, as a TVA ratepayer, and as a taxpayer, I totally oppose the production of tritium. Now that Soviet deterrence no longer "justifies" our production and stockpiling nuclear weapons, there is no justification.* 1/23.13  
*We deserve a national debate over continued production of nuclear weapons. Under what circumstances would we launch such weapons? Even if we were attacked with a nuclear weapon, how could we responsibly, morally respond with a nuclear attack? Any such use would harm the land, air and water of all the "enemies" neighboring countries. Given the power of our current bombs any attack would adversely ~~the~~ impact water and land of our entire planet.* 2/01.01  
*The sums of money to produce tritium and the continued production of nuclear weapons is obscene. A billion people barely survive on \$1.00 a day. Terrorism thrives on their desperate poverty. We could use our wealth and science to alleviate the desperate impoverishment which is our newest cold war adversary.* 3/01.10

*The sums of money to produce tritium and the continued production of nuclear weapons is obscene. A billion people barely survive on \$1.00 a day. Terrorism thrives on their desperate poverty. We could use our wealth and science to alleviate the desperate impoverishment which is our newest cold war adversary.* 1(cont'd)

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) *Lucy W. Taylor*  
Organization: \_\_\_\_\_  
Address: *2720 Folts Drive*  
City: *Chattanooga* State: *TN* Zip Code: *37415*  
Work phone: *266-1618* Home phone: *267-0765 (423)*  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 224: Marie Weir

Commentor No. 225: Mark A. Wheeler



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I AM IN FAVOR OF THE BELLEFONTE  
PROJECT BECAUSE OF THE ECONOMIC  
BENEFITS IT WILL GENERATE FOR THE  
ENTIRE AREA.

1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) MARIE WEIR  
Organization: RESIDENT OF Rhea County (TN Valley)  
Address: 6507 DAYTON HIGHWAY  
City: DAYTON State: TN Zip Code: 37321  
Work phone: 698-4163 Home phone: 775-0356  
Fax: 698-4932  
E-Mail Address: \_\_\_\_\_

12/10/94



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I am the vice president of the IBEW local #175.  
I represent the 3400 membership of my union. We have  
constructed and maintained the TVA nuclear plants from the  
start. Having had hands-on experience with these plants, we know  
that they are very safe.

1/07.02

As American citizens who love this country and the freedom  
that it stands for all around the world, we want a strong  
defense potential to deter any enemy assault.

2/01.01

As tax paying citizens, we want commercial light water  
reactors used in lieu of an accelerator because the commercial  
reactors are a much less expensive option.

3/07.01

As residents of the Tennessee Valley, we need additional  
power capacity to maintain our way of life and to be able  
to attract new industry to this area.

4/07.03

We see the Bellefonte option as, by far the best. It would  
give the DOE economical fission and this region will get  
much needed power.

The Watts Bar/Sequoyah options, while a far second, would  
be much better than the accelerator because the smaller expense  
and would give additional revenue to TVA which would offset  
rate costs and/or provide funds for additional power facility  
construction.

3(cont'd)

While the accelerator would provide for the national  
defense, it would be economically irresponsible.

Please choose the Bellefonte option!

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Mark A. Wheeler  
Organization: IBEW #175  
Address: 1406 Gordon Farm Dr.  
City: Hixson State: TN Zip Code: 37343  
Work phone: (423) 843-6974 Home phone: (423) 842-7327  
Fax: (423) 842-6870  
E-Mail Address: M.Whe.874.315@att.net

12/10/94

Commentor No. 226: Mrs. Susan Cassidy Wilholt



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I am opposed to the Watts Bar facility  
being used to produce tritium. 1/07.07

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Mrs. Susan Cassidy Wilholt  
Organization: IBPAT  
Address: 331 EVERGREEN DRIVE  
City: SELMA State: IN Zip Code: 47321  
Work phone: 423-775-6781 Home phone: 423-775-6781  
Fax:   
E-Mail Address: SusWilholt@VeriState.net

12/10/98

Commentor No. 227: Charles R. Williams



## COMMENT FORM

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: Being a taxpayer and a TN Valley voter, I  
strongly believe TVA has a proven track record for nuclear safety.  
Having worked at both the Sequoyah and Watts Bar plants, I have  
seen first hand the minute detail to safely construct and  
these plants. 1/07.02

Knowing the economic impact of Sequoyah Nuclear Plant  
Tales from my town and the impact in economics around  
the Watts Bar Nuclear Plant, I feel for the people in  
Alabama who are now unemployed and a chance for  
growth. As it is now, Bellefonte stands as a giant expense of  
no use in expense. The completion of Bellefonte is the only  
win-win choice for Ratepayers - Taxpayers and the Citizens  
in and around the Bellefonte Plant. 2/07.08

Thank you.

Charles R. Williams

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) Charles R. Williams  
Organization: IBPAT  
Address: 108 Porter St.  
City: Sally, Daisy State: IN Zip Code: 47379  
Work phone: (423) 693-4163 Home phone: (423) 332-5333  
Fax:   
E-Mail Address: Ru.1954@AOL.COM

12/10/98

Commentor No. 228: Anonymous (6)



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: We at Midpoint International  
support the Belmont plan because  
it makes more sense and best  
for the country's future | 1/07.03

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) \_\_\_\_\_  
Organization: Midpoint  
Address: 8044 Ray Road B102  
City: \_\_\_\_\_ State: TN Zip Code: 37917  
Work phone: \_\_\_\_\_ Home phone: 615-5652  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 229: Anonymous (7)



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: I live in Rhea Co. & we don't  
want tritium here. | 1/07.07

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) \_\_\_\_\_  
Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 230: Anonymous (8)**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: *As a neighbor of the Watts Bar Nuclear Plant, I have a very real concern about the proposed production of tritium in the existing reactor. There are definite increased risk considerations to us local residents and no economic benefits - only negative ones. If this option is approved and it seems the leading contender, I believe TVA/DOE should reflect some of the large monetary exchanges to our local governments as some compensation to us local ratepayers and taxpayers. Please make this part of the decision process.*  
*[My wife - a Tennessee housewife does not want Watts Bar - Sequoyah option either, Mr. Secretary.]*

1/07.07

2/23.23

1(cont'd)

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) \_\_\_\_\_  
Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 231: Anonymous (9)**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: *If Mr. Richardson is to do what's best for the "Nation as a whole", the Bellefonte option is clearly the only choice that can be made. If any other choice is made it will send or confirm the message that "Political Posturbation" has prevailed again.*

1/07.03

2/05.26

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) \_\_\_\_\_  
Organization: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Work phone: \_\_\_\_\_ Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98



Commentor No. 232: Mike Womacks

I want to direct my comments to the letter written by Craven Crowell to Mr. Richardson, and express my opposition to Bellefonte.

Under the <sup>subject</sup> paragraph social economic it is stated that thousands of jobs will be created both long and short term. I submit to you that the <sup>bulk of</sup> short term jobs will be taken by the unions from Tenn. which is wonderful then, but hardly helpful to the citizens of Jackson County. The 800 long term jobs ~~are~~ hardly approach the number thousands as stated in the letter. I submit again the citizens of Jackson County will not receive the bulk of these jobs as we

are somewhat short of nuclear engineers and other workers qualified to work at a nuclear plant.

Under Public & Political Support, I grant you have local political support and some Congressional support. However the following members of Congress have stated opposition to the production of tritium at Bellefonte. (Read Deman) As far as the local citizens are concerned, I can tell you there is absolutely not a majority in favor of Bellefonte production, and I support challenge the local politicians to

1/13.05

2/01.02

Commentor No. 232: Mike Womacks (Cont'd)

conduct an election to <sup>or referendum</sup> ~~poll~~ let the people speak for themselves. I hate the democratic way. Also why were not the negative EIS comments included in this letter.

In conclusion ~~the~~ one has addressed the issue of local property values, and they will surely go down. <sup>less for local area</sup> There is definitely a ~~good~~ economic benefit to local residents in Scottsboro.

In conclusion, I understand the need for jobs and support the construction of a natural gas plant. I don't appreciate the citizens of Tenn. of anywhere else telling me what is good for my community. As for our national security, I spent 23 yrs in the military which included involvement in 3 wars. Believe me we have enough nuclear bombs to destroy ~~any~~ adversary. If we do need more tritium let's put it in an area that is already contaminated, not contaminate a new one.

3/23.22

4/13.06

5/07.06

6/01.01

7/07.07

**Commentor No. 233: Larry Hancock**

December 14, 1998

Hello,

My name is Larry Hancock. I am the Recording Secretary for the International Brotherhood of Electrical Workers, Local 721, Chattanooga, Tennessee. Our local represents approximately 700 members which consists of Operators, Electricians and Instrument Mechanics at Sequoyah Nuclear Plant, Bellefonte Nuclear Plant, and other TVA facilities in the immediate area.

I am here tonight to stand in opposition to the proposal of using Watts Bar and Sequoyah as the producers of Tritium for the Department of Energy. There is much to be lost by TVA and the valley if Tritium is produced at Watts Bar and Sequoyah, and much to be gained by producing it at Bellefonte!

Watts Bar and Sequoyah are both base load units for TVA, and as such are needed on line as much as possible. If they are used as Tritium producers for D.O.E. they could be shut down if needed by D.O.E. to support our National Defense. TVA and the valley can't afford to be without the power that these two plants generate! Since both of these plants are up and running, successfully, I might add, there is absolutely nothing to be gained for this area if those units produce Tritium, even if TVA management says that either selection is a win for TVA and the valley. That is a bald-faced lie! There will not be any construction jobs or permanent jobs produced by selecting Watts Bar and Sequoyah! The only win for TVA and the valley is for Tritium to be produced at Bellefonte.

1/07.07

If Tritium is produced at Bellefonte there are many economic benefits for TVA and the valley. First and foremost is all the employment possibilities that exist for the entire area. During construction, many of this areas construction workers will have the opportunity for gainful employment at Bellefonte. There will not be any construction jobs produced by selecting Watts Bar and Sequoyah! Additionally, the local that I represent anticipates gaining much more than a hundred new members as Bellefonte is staffed with permanent workers.

Another issue that I would like to raise is: **WHY ARE WE EVEN HERE TONIGHT?** There are many reasons why the CLWR option is still open to D.O.E. **All of them are because of the efforts put forth by the many organizations that helped fight the fight to keep the CLWR open!** Organized labor, Business leaders, Education leaders, Bipartisan political and a strong community support have kept this option open. All of their efforts were for one selection and one selection only. **That was the completion of Bellefonte.** There was a lot of time and money invested by all of these organizations to see this happen. Now that all those efforts were successful, it appears that Secretary Richardson wants to let Watts Bar and Sequoyah slip in under the door. We must not let that happen! Swapping projects at this time is very disappointing and would appear to be a deceptive move by the Department of Energy.

2/07.08

**Commentor No. 233: Larry Hancock (Cont'd)**

The facts show that the CLWR option is the best one of the of the dual path options for D.O.E., and the selection of Bellefonte as the CLWR facility is the only selection that must be made.

3/07.01

In conclusion, I urge Secretary Richardson the do the right thing and make his selection for the CLWR option with Bellefonte as the primary CLWR producer.

Thank you.

Commentor No. 234: Dwight Wilhoit

①

In 1986, Ned Ray McWhorter was elected Governor of Tennessee and after serving two terms in the Governor's mansion, Governor McWhorter left public office in 1994 as one of the most popular and beloved elected officials in the 200 year history of Tennessee. In fact, Time Magazine wrote that the only reason that Governor McWhorter was not elected to the United States Senate in 1994 was because he did not run. In the first cabinet meeting held by Gov. McWhorter, with the heads of all the departments present, Gov. McWhorter ended the cabinet meeting with <sup>this</sup> ~~his~~ simple and straightforward directive: "Remember, It's never too late to do the right thing". He didn't say to do what was easy or to

Commentor No. 234: Dwight Wilhoit (Cont'd)

②

do what was cheap. He told his cabinet to do the right thing.

For years, the citizens of this country have been subjected to people of power and influence who were only interested in what was easy or what was cheap. One only has to look a few miles from this very spot to see such an example. The large coal companies of the 20's and 30's who would come to an area and strip mine the coal and rape the land and when they left, the land was devastated and lives destroyed. They had done what was easy and what was cheap. So the citizens of the area looked to their government to see that the right thing was done. And legislation was passed that forced the

Commentor No. 234: Dwight Wilhoit (Cont'd)

③

coal companies to reclaim the land and return it to the way it was found. It was the right thing to do. Or one can look at the chemical companies of the 50's and 60's, captains of industries and corporate CEO's who dirtied our air and fouled our water. In the early 60's, the Cayahoga River that flows through Cleveland, Ohio, became so polluted that the river caught on fire, or the most infamous example of all – Love Canal where chemicals were dumped and scores of innocent children died years before their time. The chemical companies had done what was cheap and what was easy. So the people turned to their government to do the right thing. And the Clean Air Act and the Clean Water Act were passed. It

Commentor No. 234: Dwight Wilhoit (Cont'd)

④

wasn't what was cheap; it wasn't what was easy; it was the right thing to do.

Now the secretary of Energy is faced with making a choice of where this country's new supply of Tritium will be made. His choices are simple. He can place it at Watts Bar where the people have expressed their opposition towards it and by placing it there will do nothing to help the economic well being of the citizens of the Tennessee Valley. This is the cheap way, this is the easy way. Or he can place it at Bellefonte Nuclear Plant in North Alabama where the citizens of that area have shown time and time again, their over whelming support to have the production of Tritium in their area and by placing it at

1/07.08

Commentor No. 234: Dwight Wilhoit (Cont'd)

5

Bellefonte Nuclear Plant, help a depressed area by bringing thousands of construction jobs and hundreds of permanent jobs to an area where unemployment is running 9 to 10 percent. Mr. Secretary, this is the right thing to do. Please, Mr. Secretary, do not take the cheap or easy way, thereby saying that you don't give a damn about the people of the Tennessee Valley. Mr. Secretary, in the words of Gov. McWhorter, remember, it's never too late to do the right thing.

1(cont'd)

Commentor No. 235: Mary Dennis Lentsch

Mary Dennis Lentsch  
1236 N Concord Road  
Chattanooga TN 37421

I am pleased to have the opportunity to speak at this meeting. I have prepared a chart that spells TRITIUM down the side.

Next to each letter I have placed a quality or characteristic that I believe can be ~~lined~~ with our tritium topic this evening.  
*linked*

**TRUTH**

The truth is that we do not need more tritium! It is my understanding that the U.S. has a reserve of tritium now and the DOE estimates this is enough tritium to last until 2016. Considering the half-life of tritium it does not seem wise or needed to produce and stockpile more tritium at this time. The truth is that we do not need more tritium!

1/02.01

**RESPECT**

Respect among nations seems to be the key to moving nations of the world away from reliance on nuclear weapons. The U.S. has prevailed upon other nations to maintain a complete ban on the use of commercial facilities for military nuclear purposes. The proposed tritium production at Watts Bar and Sequoyah is an apparent contradiction in our nuclear weapons policies. How can the U.S. break the ban and maintain respect among nations?

2/01.09

**INTEGRITY**

The U.S. cannot maintain its integrity when it produces tritium which is a violation of the nuclear nonproliferation treaty which the U.S. agreed to in 1970. I believe when we are talking about nuclear nonproliferation that U.S. integrity is critical. We must NOT move ahead with a new tritium program that has the potential to undercut a long-standing nonproliferation policy.

3/01.04

**TRUST**

We trust that the decision made by Secretary Bill Richardson and the Department of Energy will say "NO" to tritium production. In saying "NO" to tritium production the U.S. would be showing the world we are committed to reducing the nuclear danger which hangs over all of us.

1(cont'd)

**Commentor No. 235: Mary Dennis Lentsch (Cont'd)****INTERDEPENDENCE**

Interdependence among nations in enforcing and living up to the agreements of the nuclear nonproliferation treaty is vital for all nations. I believe the U.S. plans to use commercial nuclear power plants to produce tritium for nuclear weapons blurs the lines between civilian and nuclear applications of nuclear power and sends a dangerous nonproliferation message to other nations.

3(cont'd)

**UNDERSTANDING**

It is beyond understanding why there is such urgency for tritium production at Watts Bar and Sequoyah plants when there seems to be an emerging consensus for significantly reducing the U.S. nuclear arsenal.

4/01.12

**MERCY**

If the decision is made to produce tritium at the Watts Bar and Sequoyah plants, all I can say is MERCY ME! OH, LORD, HAVE MERCY! The impact and consequences of tritium production at the local level, the national level, and the international level cause me to say- MERCY ME! OH, LORD HAVE MERCY!

5/07.07

**Commentor No. 236: Joseph A. Imhof**

Juno e-mail printed Thu, 10 Dec 1998 20:21:27 , page 1

From: debhof  
To: debhof@juno.com  
Subject: PUBLIC HEARING ON DEC. 14 , 1998 .

PUBLIC HEARING FOR CONSIDERATION  
OF USE OF WATTS BAR & SEQUOYAH  
UNITS FOR LONG TERM PRODUCTION  
OF TRITIUM

EVENSVILLE , TENNESSEE

DECEMBER 14 , 1998 .

" A PLAN WE CAN LIVE WITH —  
A COMMON SENSE SOLUTION . "

Commentor No. 236: Joseph A. Imhof (Cont'd)

Juno e-mail printed Thu, 10 Dec 1998 21:00:04 , page 1

From: debhof  
To: debhof@juno.com  
Subject: PUBLIC HEARING - DEC. 14 , 1998

\_\_\_\_\_PREAMBLE\_\_\_\_\_

In a ~~more~~ perfect world , human concerns  
( and not vested interests ) would be a BASIS  
for policy decisions , not just a CONSIDERATION .  
Human Concerns , here , meaning taking into  
account the factual known impacts of actual ,  
real operating nuclear facilities upon the health  
and welfare of individual human beings and  
other biological entities.

\_\_\_\_\_THESIS\_\_\_\_\_

The best policy would be one which entails  
the least amount of harm to the fewest individual  
human beings and the smallest number  
of biological entities . This means that the  
impact of tritium production should be  
minimal , period.

\_\_\_\_\_ACTION PLAN\_\_\_\_\_

Use existing facilities to produce tritium  
whenever humanly possible without  
impacting new areas of population  
and generating additional expense to  
American taxpayers . Avoid creating new  
health risks and environmental concerns  
by using existing facilities.

1/07.08

Commentor No. 236: Joseph A. Imhof (Cont'd)

Juno e-mail printed Thu, 10 Dec 1998 21:39:18 , page 1

From: debhof  
To: debhof@juno.com  
Subject: PUBLIC HEARING , DEC 14 , 1998 .

\_\_\_\_\_RECOMMENDATION\_\_\_\_\_

Based on consistency with the best policy ,  
a recommendation is made to use Watts Bar  
as the main unit for production of tritium ,  
while maintaining Sequoyah as a back - up  
facility . Bellefonte would have prime  
consideration as a natural gas electric  
power production facility , costing billions  
less than a nuclear plant , and providing  
plentiful power to the Tennessee Valley ;  
thus fulfilling TVA'S mission without relying  
on corporate welfare . Bellefonte should  
NOT be considered as a coal - fired plant ,  
as this would be a source of acid rain ,  
particulate matter , and an aggravation to  
those with respiratory illnesses.

\_\_\_\_\_CONCLUSION\_\_\_\_\_

In a perfect world , there would be no need for  
nuclear arms , anti-missile missiles , or  
Strategic Defense Initiatives . However ;  
if we must accomodate the nuclear defense  
industries' need to proliferate the use of  
nuclear weaponry , let us do it in a manner  
which does the least amount of harm to  
biological entities ( esp. ; us ) and the  
least possible damage to our precious  
life support system , the environment .  
In conclusion , let 's strive for minimum  
impact by using existing facilities for

1(cont'd)

Commentor No. 236: Joseph A. Imhof (Cont'd)

Juno e-mail printed Thu, 10 Dec 1998 21:39:18 , page 2

tritium production and limit the amount  
we project for future needs to what is  
realistic for an era in which the demand will  
surely decrease .

*I(cont'd)*

SUBMITTED BY

JOSEPH A. IMHOF  
HUNTSVILLE , AL  
256 - 880 - 1019

Commentor No. 237: Steve Tanner

Comments of Steve Tanner at DOE Public Meeting on TVA's Watts Bar/Sequoyah Services Offer - December 14, 1998, Evansville, TN

Good Evening, my name is Steve Tanner. I come here today representing myself and my family as residents of Hamilton County, as ratepayers, and as U.S. Taxpayers.

You have asked for our input regarding TVA's Watts Bar/Sequoyah Services Offer. Let me begin by stating that we support your efforts in obtaining as much input as you can regarding public opinion. In fact, this past summer I received a response from Vice President Gore regarding tritium production legislation that was pending at the time. In that response, the Vice President assured me his intention was to act in the best interest of all citizens. Holding this meeting this evening, we believe, supports that intent.

You have stated the selection criteria being considered. You also stated the overall consideration is "What's in the best national interest". One criteria you did not list though, which is stated in Public Law, involves the "liabilities and benefits of the technologies including benefits like revenues".

In comparing the WBN/SQN Services Offer and the Bellefonte Offers against the criteria, all of the TVA Offers whether Bellefonte or Watts Bar/Sequoyah, meet the criteria, and all can be implemented in a manner that supports reduced tritium needs as well as any perceived proliferation concerns. We believe, though, that the Watts Bar/Sequoyah Offer is not the best selection. WHY? Here's three major reasons:

1. There are liabilities and risk. The offer commits two baseload nuclear power generation plants to a mission that would no longer be solely to produce power. This places a liability of tritium production on TVA with increased risks to TVA's ability to provide reliable low cost power to their customers and ultimately to us as ratepayers.
2. There are no benefits. There is no direct benefit to Hamilton or Rhea counties or the State of Tennessee. No new jobs and no increase in the tax base. This offer does not salvage use of an existing government asset, there is no revenue sharing to DOE, and the positive environmental benefit of new power generation without greenhouse gas emissions does not occur.
3. The overall cost is higher than using Bellefonte. The total cost with this offer to me as a taxpayer, even though it has low annual payments, is higher than the TVA Bellefonte Offers and is for a shorter period of time.

1/07.08



**Commentor No. 237: Steve Tanner (Cont'd)**

We believe that Bellefonte is the best selection because it meets the selection criteria, has the lowest cost to us as taxpayers, does not have the liabilities and risk of a baseload plant, and provides distinct benefits. Benefits that are shared not only locally and regionally, but also on a national level. National benefits such as lowest cost to the taxpayer, an environmental benefit of new power generation without greenhouse gases, and revenues allowing for cost recovery.

In addition, DOE must not forget that the Department has other missions in addition to national security. DOE's core mission statement starts off with these words: "To foster a secure and reliable energy system that is environmentally sustainable,...". As part of DOE's FY99 budget process, DOE stated they had established five key goals that drive all strategic planning and budgeting decisions. Three of those goals are directly supported by a selection of Bellefonte but are not supported by a selection of Watts Bar/Sequoyah.

**Selection of Bellefonte:**

1. Has DOE promoting clean efficient energy and enhancing energy security through new nuclear power generation capacity,
2. Shows DOE stabilizing and protecting the environment by preventing a new fossil fueled power generation with greenhouse gas emissions, and
3. Has DOE stimulating U.S. economic productivity through creation of new jobs and multi-regional economic development.

Selection of Watts Bar/Sequoyah does not promote, enhance, stabilize, protect or stimulate anything associate 1 with these goals.

Investment in new power generation is not outside of DOE's mission. Bellefonte meets the criteria, can be available to produce tritium when and if DOE has the need, can fully support key DOE goals, and provides benefits not available with the Watts Bar/Sequoyah Offer.

My family and I contend that the Secretary's decision should not just select an acceptable option, but should select the option that - using the Vice President's words - is in the "Best Interest of all citizens".

**Commentor No. 237: Steve Tanner (Cont'd)**

Last week the Vice President also said that one of the last things his father said to him was "always do right". We sincerely hope that after hearing the public opinions from tonight's meeting, the Secretary will in fact, "do right".

In conclusion, DOE - Do not select the TVA Watts Bar/Sequoyah Services Offer, instead select an offer that partner's DOE with TVA in the completion of Bellefonte, providing local, regional and national benefits versus regional liabilities and risks, and which can do all of this while providing an assured supply of tritium.

*I(cont'd)*

*I(cont'd)*

Commentor No. 238: Steven Howell

Industrial Fibers

December 14, 1998

Re: Comments by Steven Howell  
Yarn Plant Manager  
AKZO Nobel Industrial Fibers, Inc.  
Scottsboro, AL.

TO: Secretary Bill Richardson, DOE

I represent a 750,000 square foot facility located in Scottsboro, Alabama. We employ approximately 715 people at our facility and have annual sales of close to 150 million dollars.

I am totally against the use of Watts Bar/Sequoyah as the site for proposed Tritium production. This is based on the adverse impact to the regions power supply that this would have. As I am sure you are aware that by completing Bellefonte it would add approximately 1200 MW of new power generation to the TVA power system. This is in contrast to the use of Watts Bar/Sequoyah which would compromise the power generation of these units. This past summer the shortage of power generation in the TVA system caused millions of dollars of extraordinary high power bills for Tennessee Valley Industries.

This past summer TVA generation could not meet the power demand and had to purchase power from outside systems. This cost our plant in an excess of one (1) million dollars this past summer. The economic benefit to the whole Tennessee Valley would be best served by completing Bellefonte. In addition to the economics of using Bellefonte an added benefit would be that by using Bellefonte for power generation fossil fire generation would not be needed to meet peak demands. This would reduce the greenhouse gases that are released to the atmosphere.

Therefore, based on environmental and economic benefits from the completion of Bellefonte to make Tritium I strongly request that Secretary Richardson after reviewing all aspects will select Bellefonte. By doing so the best interest of our country as well as the Tennessee Valley will be served.

Thank you for allowing me to speak on this most important matter to the Tennessee Valley.

Sincerely,

Steven Howell  
Yarn Plant Manager

Akzo Industrial Fibers, Inc.  
7526 Akzo Blvd.  
Scottsboro, AL 35766-8106  
Phone: 205-574-7200  
Fax: 205-574-7274

1/07.08

Commentor No. 239: Groups Opposed to CLWR Tritium  
Production

**GROUPS ACROSS THE NATION OPPOSE COMMERCIAL REACTOR  
PRODUCTION OF TRITIUM**

December 14, 1998

The Honorable Bill Richardson  
Secretary of Energy  
1000 Independence Avenue  
Washington, DC 20585

Dear Secretary Richardson:

The undersigned organizations, representing thousands of concerned citizens throughout the country, strongly oppose U.S. plans to utilize any commercial nuclear power plants to produce tritium for nuclear weapons. In our view, such a plan would blur the line between civilian and military applications of nuclear power and thus sets a dangerous precedent from a non-proliferation standpoint. In addition, further reductions in nuclear arsenals, supported by your administration and increasingly likely, would make a new source of tritium unnecessary.

1/07.02

As you are aware, it has been the long-standing policy of the United States to separate military and civilian uses of nuclear technology. We stand behind that policy and continue to believe that in this area, the United States must make non-proliferation concerns paramount. Recent revelations that the Indian government procured tritium for its nuclear weapons program from Western-built 'civilian' reactors reinforces our view.

Section 56e of the Atomic Energy Act forbids special nuclear material produced in a commercial reactor from being used "for nuclear explosive purposes." While definitions of "special nuclear material" do not include tritium, this technicality does not mask the fact that the Department of Energy plans to use a source of civilian electricity as a source of material to boost the destructive power of the nuclear weapons in the U.S. arsenal. As a former Ambassador to the United Nations you must be able to appreciate how apparent contradictions in our nuclear weapons policies undercut our ability to champion the cause of nuclear non-proliferation abroad.

2/01.09

The U.S. timeline for securing a new source of tritium is based on out-dated thinking in terms of the size of the U.S. nuclear arsenal. The United States still bases its planning on maintaining a START (Strategic Arms Reduction Treaty) I arsenal. Implementation of START II, now pending ratification in the Russian Duma, will delay the "need" for new tritium until at least 2011 since the tritium from nuclear weapons being retired under the provisions of the START treaties can be recycled into the nuclear weapons slated to remain in the arsenal. The lower force levels envisioned under the broad outlines of START III agreed to by Presidents Clinton and Yeltsin last year would delay the "need" for new tritium even further into the 21st Century.

3/02.01

**Commentor No. 239: Groups Opposed to CLWR Tritium  
Production (Cont'd)**

We are particularly concerned about the prospect of using taxpayer dollars to complete the construction of the Tennessee Valley Authority's Bellefonte nuclear reactor to produce nuclear weapons tritium. In addition to the substantial burden this proposal would present for taxpayers, bringing Bellefonte on-line would add to the ever growing amount of nuclear waste in the United States. A problem for which there is no adequate solution.

4/23.13

We understand that your office is under considerable pressure to choose between a number of potential tritium sources, each of which has considerable fiscal or non-proliferation drawbacks. At a time of emerging consensus on the desirability of significantly reducing the U.S. nuclear arsenal we urge you to make the courageous decision of "none of the above" regarding tritium sources. We stand ready to work with your office on the removal of legislative language forcing the United States to maintain a massive Cold War-sized arsenal.

3(cont'd)

The United States does not need to move forward with a new tritium program that will waste further taxpayer dollars and has the potential to undercut long-standing non-proliferation policy.

4(cont'd)

5/01.04

Sincerely,

**NATIONAL ORGANIZATIONS**

Susan Gordon  
Alliance for Nuclear Accountability

Michael Mariotte  
Nuclear Information and Resource  
Service

Bruce Hall  
Peace Action

Betty Obal  
Sisters of Loretto

Bob Kinsey  
United Church of Christ  
Peace and Justice Task Force

Jim Riccio  
Public Citizen's  
Critical Mass Energy Project

Susan Shaer  
Women's Action for New Directions

**REGIONAL AND LOCAL ORGANIZATIONS**

Jim Allen  
Vine and Fig Tree  
Montgomery, AL

Bill Akin  
Mid-South Peace & Justice Center  
Memphis, TN

**Commentor No. 239: Groups Opposed to CLWR Tritium  
Production (Cont'd)**

Jacqueline Cabasso, Executive Director  
Western States Legal Foundation  
Oakland, CA

Marcus Keyes  
Office of Justice, Peace & Integrity of  
Creation  
Roman Catholic Diocese of Knoxville  
Knoxville, TN

Tom Carpenter  
Government Accountability Project  
Seattle, WA

Reinard Knutsen  
Shundahai Network  
Las Vegas, NV

Donald Clark  
Cumberland Countians for Justice &  
Peace  
Pleasant Hill, TN

Adele Kushner  
Action for a Clean Environment  
Alto, GA

Judy Cumbee  
Justice-Peace-Human Rights Committee  
of Alabama New South Coalition  
Montgomery, AL

Greg Mello  
Los Alamos Study Group  
Santa Fe, NM

Bruce and Maggie Drew  
Prairie Island Coalition  
Lake Elmo, MN

Michelle Neal-Conlon  
Foundation for Global Sustainability  
Knoxville, TN

Marjie Edguer  
Cleveland Peace Action  
Cleveland, OH

Rick Nielsen  
Citizen Alert  
Las Vegas, NV

Don Hancock  
Southwest Research & Information  
Center  
Albuquerque, NM

Harry Rogers  
Carolina Peace Resource Center  
Columbia, SC

Ralph Hutchison  
Oak Ridge Environmental Peace  
Alliance  
Oak Ridge, TN

Susan Lee Solar  
Grandmothers and M/others Alliance for  
the Future  
Austin, TX

Carol Jahnkow  
Peace Resource Center of San Diego  
San Diego, CA

Lynne Stembridge  
Hanford Education Action League  
Spokane, WA

Marylia Kelley  
Tri-Valley CAREs (Citizens Against a  
Radioactive Environment)  
Livermore, CA

Diane Swords  
Peace Action Central New York  
Syracuse, NY

Ellen Thomas  
Proposition One Committee  
Washington, DC

**Commentor No. 239: Groups Opposed to CLWR Tritium  
Production (Cont'd)**

Harvey Wasserman  
Citizens Protecting Ohio  
Bexley, OH

**Commentor No. 240: Ronald W. Boles**

Ronald W. Boles  
DOE Hearing on Tritium Production  
Rhea County High School  
Evansville, Tennessee  
December 14, 1998

My name is Ronnie Boles. I am Chairman of the Electric Utility Board in Huntsville Alabama. I come to you as a concerned member of the electric power community. My concerns with TVA producing tritium at the Watts Bar and Sequoyah nuclear power plants encompass the electric power production capabilities of TVA under this proposal, economic development, national security and the life cycle costs.

Allow me to be specific.

TVA offers you a plant at Bellefonte dedicated to the production of tritium. The production cycle of 12 months maximizes the amounts to match DOE's needs. Over the lifetime of this plant, you are assured of a reliable source and the repayment of the money you invest.

Under the Watts Bar/Sequoyah proposal, tritium production is secondary to electric power production. Otherwise this shutdown of the plants will raise TVA's power production costs when the plant is shut down for tritium collection. This past year, during the hot summer months, TVA had to go off-line to purchase power because it could not meet the demands of its customers. During such times, our industrial customers on interruptible service have to pay higher than usual prices for electric power, reflecting TVA's higher costs for this supplemental energy. Tritium collecting will shut down this dedicated plant, causing higher energy prices to be paid by these valued customers. I submit that this is not fair for the electric power consumers of TVA to underwrite tritium collection costs for DOE.

This leads me to discuss other economic development issues. DOE has shown that economic development is one of its concerns as an agency. Production of tritium at Watts Bar/Sequoyah will produce no new jobs and no new electric power. I don't need to remind you of what economic expansion will ensue with your decision to support tritium production at Bellefonte in Jackson County, Alabama, but the benefits derived from having 1200 megawatts of new electric power will benefit a whole region of the United States.

Under the Watts Bar/Sequoyah proposal, Watts Bar will be your main source of tritium; Sequoyah is designated as a backup should difficulty persist at Watts Bar. As you know, Sequoyah will be decommissioned in 2022. National security demands a stable source for tritium far past that year. Only Bellefonte offers the life span to match DOD's expectations. This fact should not be ignored.

If the issue is just dollars, DOE/DOD can buy tritium from Russia. But we cannot permit our weapons program to be vulnerable to a foreign power, merely on the basis of cost. That has never been policy in the DOD/DOE Program. A short term decision could have long term consequences for DOD, DOE, TVA and the whole nation.

The support for the completion of the Bellefonte Nuclear Plant has been chronicled in the media from the Tennessee Valley all the way to Washington. Congressmen and Senators from the six states served by TVA fought long and hard to give you this option. I dare say we would not be here tonight discussing light water reactors if their valiant efforts had not been successful.

Those people expended great political capital to afford DOE this opportunity. To now see a third option considered has been disheartening, at least from my point of view. You still have support from local, state and national figures to proceed with Bellefonte. The economics should convince you Bellefonte is the logical choice.

Thank you for allowing me to present these views to you tonight.

1/07.08

2/01.14

1(cont'd)

Commentor No. 240: Ronald W. Boles (Cont'd)



Tennessee Valley Authority, Post Office Box 328, Huntsville, Alabama 35804-0328

December 3, 1998

Mr. Bill Pippin, General Manager  
Huntsville Utilities  
Post Office Box 2048  
Huntsville, Alabama 35804-02048

Dear Bill:

Due to the volatility of last summer's Economy Surplus Power (ESP) prices, TVA has placed an indefinite moratorium on the offering of new amounts of Limited Interruptible Power (LIP) and Limited Firm Power (LFP) to directly-served and distributor-served customers. The moratorium will provide us with time to evaluate, and if necessary, restructure the LIP and LFP programs to meet the future needs of TVA and its customers.

The majority of existing LIP and LFP customers also contract for some ESP. Also, some existing ESP customers may be large enough to potentially qualify for LIP (20 MW) or LFP (30 MW). Due to the price volatility of ESP prices during the summer of 1998, some existing ESP, LIP, and LFP customers may view a possible conversion of ESP to LIP and/or LFP as a means to pay a less volatile energy rate and also reduce the probability of power being suspended during peak load periods. Without this moratorium, system operating flexibility might be lost and costs might increase if a significant amount of ESP load was converted to LIP and LFP. This moratorium will temporarily cap the amounts of LIP and LFP made available by TVA at the amounts that are under contract as of the effective date of the moratorium.

However, LIP and LFP will still be available as an industrial development tool for loads which would otherwise be eligible for TVA's Growth Credits.

If you have any questions, please contact Darrel Smith of this office or me.

Sincerely,

*David Hooks*

David Hooks  
Senior Customer Service Manager  
Huntsville Customer Service Center

*LARRY BISHOP  
Trend Leaser*

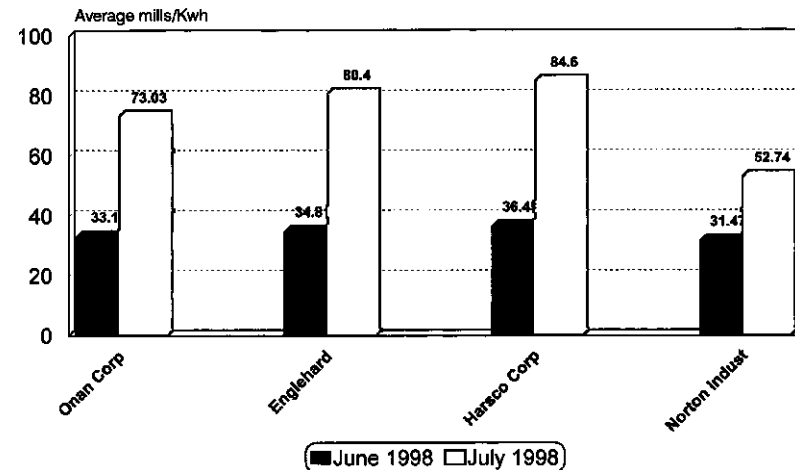
*for your info.*

*Thane  
12-10-98*

1(cont'd)

Commentor No. 240: Ronald W. Boles (Cont'd)

ESP Customers  
Average mills/Kwh



Commentor No. 241: Ann Harris

Ann Harris, Executive Director, We The People, Inc., of Tennessee  
 305 Pickel Rd., Ten Mile, TN 37880  
 (423) 376-4851 fax (423) 376-8864  
 December 14, 1998

## DOE Public Hearing Concerning Watts Bar Tritium Production

In the October meeting here at Evensville, TVA stated that they do not have a waste water program that will extract tritium from the reactor coolant water prior to release to the Tennessee River. Now I find that all you boys are aware that an extraction facility such as is needed for these light water reactors is in place in Canada. They have extracted 14 kg of tritium since 1988. And except for a small amount sold to industry and for research it remains in storage at the Canadian site. The market price is \$30,000 per gram. Send a buyer to Canada and buy what is already produced. Quit fixing what ain't broke.

Further, tritium gas does not readily absorb in to the body. BUT tritiated water virtually jumps into the body. Tritium enters the body through the skin or open wounds, absorbed into materials such as gloves, clothing and in particular metal. Now this Watts Bar plant is made of metal. Why would we want to use it? Let us go out and make another superfund site for the American tax payers and my children and grandchildren.

Tritium has been detected in the soil, rainwater and groundwater surrounding a research laboratory in California and in New York. Tritiated water is found in local creeks in the same areas. Now DOE says that there is no easy way to treat low levels of tritium found in water or soil. In addition, the position that one dose or short term exposure is not hazardous produces the notion that tritium is not dangerous. It is the extended exposure to tritium that produces the damage. Bourbon has never killed anyone BUT the extended

1/01.14

2/14.04

3/14.25

Commentor No. 241: Ann Harris (Cont'd)

abuse and use has killed millions of Americans. DOE—TVA— and those boys from the NRC that are hiding in the background are misleading these communities.

Permit me to give you some of your own research data back to you

- #1: University of Chicago—high birth deaths rates
- #2: Lawrence Livermore Laboratory—reduced levels of necessary DNA germs in females
- #3: University of California @ Berkley—mutations (cell damage)
- #4: Neuherberg, Federal Republic of Germany—death of birth mothers
- #5: Central laboratory for Radiological Protection, Wasrsaw, Poland—high rates of lung and testes cancer
- #6: Medical Research Council, Oxon, England—Mass loss in male testis—even in low dosage

You boys are from the government and you are here to help me!!!!!!!!!!!!

What you are bringing to my community and river is nuclear thylidomide. It is the equivalent of the drug that was given to pregnant women for morning sickness in Europe and produced massive birth defects and deaths. And you are bring<sup>ing</sup> the men another "agent orange." Don't help us anymore!

The question of the safety of the primary coolant system at Sequoyah and Watts Bar are of such recognized bad design and are virtually inoperable at any give time that they are of little use during any heat up of the reactor. The TVA employee that identified these problems has received death threats on the job site at Watts Bar and at his home. These are all questions that have received little or no attention by DOE or TVA in consideration of making TVA rate payers responsible for DOE's continuing mismanagement coupled with TVA's current standards and mismanagement. It begs the question of whether or not tritium production at TVA is an asset to the valley and can the rate payers afford this type of long range and unknown consequences?

3(cont'd)

4/09.10

**Commentor No. 242: Carl Fowler**



**Sheet Metal Workers' International Association**

LOCAL UNION NO. 48

1108 29th Street North  
Birmingham, Alabama 35234  
Phone (205) 322-9016

December 14, 1998

My name is Carl Fowler, Assistant Business Agent of Sheet Metal Workers' Local Union #48, Birmingham, AL. On behalf of our members and myself, as concerned tax paying citizens, I would like to address the issue of Tritium production.

By the year 2011, the United States supply of Tritium will be depleted. President Clinton has ordered that new Tritium be available by 2005. Since 1995, the Department of Energy has been investigating alternative methods for Tritium production. By law, the Secretary of Energy must decide before the end of this year on whether the department will use a commercial light water reactor or another method. I would like to briefly compare those alternatives.

In 1997, an experimental reactor at the Hanford Nuclear Reservation in Washington State was put on "a hot standby" as a possibility. That reactor is only capable of producing 1 1/2 to 2 kilograms of Tritium a year at full Capacity. The reactor at Hanford would have to be recommissioned at a cost of 200 million dollars or more and the annual operating expense would be about 88 million dollars. Hanford doesn't need more trouble, contends a spokesman for the group Government Accountability Project, who states, and I quote "There's already enough waste there to fill a football field to 250 miles in the sky-high enough that the space shuttle would bump into it." Sheet Metal Workers' stand opposed to the Hanford site.

1/06.03

A second possibility is the Proton Accelerator, which if chosen, would be built in South Carolina. In 1995, a Department of Energy report, listed the cost at between 9 and 12 billion dollars. Also, the accelerator would require a significant power supply. It's estimated that the accelerator would consume 400 mega watts of electricity a year and cost taxpayers between 100 and 200 million dollars in electrical cost alone. Also, the Proton accelerator uses a technology that's unproven. Are we going to dig another hole in the ground and call it "Super Collider II?" Also, the Proton Accelerator cannot meet the schedule of Tritium production by 2005. Sheet Metal Workers stand opposed to the Proton accelerator.

2/07.01

Then there is the final alternative of producing Tritium in a Commercial Light Water Reactor. Within the last month there are now basically two proposals for using a light water reactor, the Watts Bar/Sequoyah Service offer and the Bellefonte Nuclear Plant service offer. Let's compare the two options.

**(1) Costs:**

With revenue sharing the Bellefonte offer would provide the D.O.E. with an opportunity to recover the initial investment. In other words, Bellefonte's total investment plus interest would be repaid in full. TVA recently submitted a Bellefonte reduced payment offer which reduces D.O.E. payments by more than 700 million dollars. With or without revenue sharing, the Bellefonte offer has a lower life cycle cost to D.O.E. for Tritium production than any other alternative including the Watts Bar/Sequoyah offer. Tritium is sold commercially for about 30 million dollars a

3/07.08

**Commentor No. 242: Carl Fowler (Cont'd)**

kilogram. The Watts Bar/Sequoyah offer will cost close to 26 million dollars a kilogram compared to Bellefonte's offer for the same service in the range of 0 to 12.38 million dollars. Neither of these two offers includes other program cost, such as, target rod fabrication, transportation nor the construction and operation of the Tritium Extraction Facility, all of which makes the Bellefonte offer ~~far~~ below the commercial cost of Tritium.

**(2) Production capability:**

Although the numbers are classified, the D.O.E. will need between 2 and 3 kilograms of Tritium each year to replace the material in nuclear weapons. Watts Bar/Sequoyah will produce up to 3 kilograms of Tritium a year with a 18 to 24 month production cycle, with only 25 years of production. With the Watts Bar/Sequoyah offer, electricity will be the first priority and Tritium as a secondary mission. On the other hand, Bellefonte will produce up to 5.6 kilograms of Tritium per year with a 12 month production cycle if needed and a source of Tritium production for up to 40 years. Bellefonte will be totally dedicated to the production of Tritium. In other words, Tritium first, electricity second.

**(3) Economic Impact:**

The Watts Bar/Sequoyah offer will mean no new jobs, no regional economic benefits and no increase to state and local revenue. The Bellefonte offer will mean thousands of new jobs, both short term and long term, a positive regional benefit and increase state and local revenue. Bellefonte Tritium Plant will not just be an Alabama plant for only Alabama workers. <sup>the</sup> ~~With~~ the labor unions' jurisdiction over Bellefonte 75 percent <sup>is</sup> ~~are~~ based in Tennessee. It's estimated that 50 percent of the workforce will be from Alabama, 45 percent from Tennessee and 5 percent of the workers will be from Georgia.

**(4) Support:**

There has been no local public, government, state, organized labor or congressional support for the Watts Bar/Sequoyah offer. As a matter of fact, there has been public opposition with no supporting comments from the environmental impact study public meetings. Bellefonte has active support from local, government, state, organized labor and congressional support. There were more than 80 environmental impact study comments in favor of Bellefonte. Sheet Metal Workers' stand opposed to the Watts Bar/Sequoyah offer.

Here we are at the 11th hour of decision and still no choice. Let's choose the most logical and feasible choice. That choice is Bellefonte. Only Bellefonte provides new jobs, the lowest cost to taxpayers, provides multi-state economic benefits and offers a revenue payback to benefit taxpayers. Only Bellefonte has local, state, bipartisan Congressional support and organized labor support. Finally only Bellefonte would offer production flexibility with operating cycle lengths and would be totally dedicated to the production of Tritium.

Let's not play politics with our future and the future of our country. The facts speak for themselves. Only one choice, Bellefonte Tritium Production Facility must be chosen.

Thank-you.

3(cont'd)

Commentor No. 243: Don Nelms**Plumbers & Steamfitters LOCAL UNION NO. 498**

P.O. BOX E 3803 WEST MEIGHAN BOULEVARD  
GADSDEN, ALABAMA 35904

Phone:  
(205) 546-6791

Fax:  
(205) 547-6330

December 13, 1998

Secretary of Energy Bill Richardson  
Forestall Building  
1000 Independence Ave., S.W.  
Washington, D.C. 20585

Secretary Richardson,

I am Don Nelms, Business Manager for Local 498, Plumbers & Pipefitters of Northeast Alabama. I am here on behalf of our members and their families, who in support of the use of Bellefonte for D.O.E.'s Tritium Production Plant.

First let me say we don't understand a government that will spend \$40 million Plus dollars to take one man out of a job that he is doing very well, but will not jump at a chance put thousands of it's tax payers to work. WE JUST DON'T UNDERSTAND THIS.

Our members and their families live in the Bellefonte area and want to work and raise their children there.

There are many reason Bellefonte should be the choice of D.O.E.

New Jobs, Lowest Cost, Very Strong Support, A New Electrical Source, and Provides At Least 15 Years more use than Watts Bar / Sequoyah.

Bellefonte provides at least 40 years to you, Watts Bar/ Sequoyah only 25 years. 40 years of jobs for taxpayers, payback to D.O.E. only at Bellefonte not Watts Bar/ Sequoyah.

At Bellefonte Tritium will be the main product, electric power will be a by-product. Not so at Watts Bar/Sequoyah. The use of Watts Bar/Sequoyah would force more Use of Fossil Fuel Plants that will cause more Air Pollutant. Not at Bellefonte. It will be another source of much need clean Electrical Power

Does Public Support cause a problem for D.O.E. ?

At Bellefonte you have the support of the People in the area, Local, State, and Congressional Political Leaders, and all Labor groups in the area.  
Not So Anywhere Else.

T.V.A. was founded to create Jobs and Electric Power for the American People. The selection of Bellefonte is the only offer on the table in which T.V.A. & D.O.E. can continue to provide Either of these to America.

Thank You  
*Don Nelms*  
Don Nelms  
Business Manager  
Plumbers & Steamfitters LU 498

**AFFILIATED:** American Federation of Labor and Building and Construction Trades Department.

1/07.08

Commentor No. 244: James B. Sandlin, P.E.

**Scottsboro**  
ELECTRIC POWER BOARD

P.O. Box 550  
404 E. Willow Street  
Scottsboro, Alabama 35768  
(256) 574-2880 Fax: (256) 574-5085  
Web address: [www.scottsboropower.com](http://www.scottsboropower.com)

Date: December 14, 1998

Re: Comments by James B. Sandlin, P.E.  
Manager of Scottsboro Electric Power Board  
Scottsboro, Alabama

To: Secretary Bill Richardson, DOE

I am totally against the Watts Bar/Sequoyah Tritium proposal from TVA to meet the nation's tritium supply. My comments will be focused on the impact to the regions power supply, as operated and maintained by TVA, and the cost and availability of said TVA power.

Choosing the Watts Bar/Sequoyah Tritium option would substantially compromise the regions power supply during moderate to extreme loading conditions. The summer of 1998 brought criticality to the supply and price of interruptible power for many Tennessee Valley industries. As my colleague from the Scottsboro Akzo Nobel Industrial Fibers facility will explain, that while power was available, the price incurred created cataclysmic conditions for these industries. My customer, Akzo Nobel, saw a significant increase in power cost over the late summer months.

MONTH	Electric Bill
May 1998	\$464,786.11
June 1998	\$731,904.84
July 1998	\$841,469.13
August 1998	\$558,995.82

New generation of approximately 1200 MW will be added to the TVA power system a Bellefonte unit is completed. This would decrease the risk of sharp price increases because TVA would have more generation to meet the Tennessee Valley's demand for electricity. If the Watts Bar/Sequoyah option is chosen, the valley could see an even greater risk of interruptible power price instability. Generation capacity supplied by Watts Bar could become unavailable if the DOE/DOD needs to extract tritium burnable absorption during extreme load conditions.

Also, municipal and cooperative (consumer-owned) electric distribution systems would be even further jeopardized because wholesale power cost would rise if TVA Nuclear generation were not available. Fossil-fired or natural gas turbines used to meet the Valley's demand during a nuclear unit outage would also add

1/07.08



**Commentor No. 244: James B. Sandlin, P.E. (Cont'd)**

Mr. James B. Sandlin  
Comments to DOE – December 14, 1998  
Rhea County High School, Evansville, Tennessee

pg. 2

greenhouse gasses to the environment and additional costs, respectively. Clearly, nuclear power plays an important part in supplying power for our country. If we expect to maintain a robust economy and keep unemployment low, our country must rely on nuclear power to meet its' growing demand for energy.

The TVA Bellefonte options are clearly the best choice for tritium production. I strongly encourage that Secretary Richardson weigh its merits and definite tangible benefits of competing Bellefonte. The Tennessee Valley Power Distributors unanimously support the completion of Bellefonte and its role in our national defense. After all, the mission of TVA from its inception provided resources to assist other agencies and departments in keeping our national defense strong.

*1(cont'd)*

I appreciate the opportunity to speak to you on this important matter.

Sincerely,

Jimmy Sandlin  
Manager

**Commentor No. 245: Monica Blanton**



**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments:

I feel the US needs to live up to its responsibility as a world leader + practice the policies we espouse to others - such as keeping separate the commercial + military uses of nuclear power.

1/01.09

We are a prosperous nation in prosperous times + the cost to produce tritium should not be the major factor determining where it is produced.

2/23.16

I'm opposed to TVA's production of tritium at any of its facilities.

3/07.04

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name (optional): Monica Blanton  
Organization: \_\_\_\_\_  
Address: 4625 Berkley Circle  
City: Chattanooga State: TN Zip Code: 37405  
Work phone: \_\_\_\_\_ Home phone: 423 736 8232  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/11/98

Commentor No. 246: Mary Brooks**COMMENT FORM**

Please Turn in Your Written Comments  
**PRIOR**  
to Leaving the Meeting

Comments: *I am opposed to the projected  
use of Waste Bar for the production  
of Tritium. We do not want this to be  
produced here in Rhea County.*

1/07.07

Thank you for your input. Please use additional sheets if necessary and attach them to this form.

Name: (optional) *Mary Brooks*  
Organization: \_\_\_\_\_  
Address: *263 Bels*  
City: *Danville* State: *TR* Zip Code: *37321*  
Work phone: *423 759071* Home phone: \_\_\_\_\_  
Fax: \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_

12/10/98

Commentor No. 247: Robert W. Van Wyck**Radiological Consultant**

Robert W. Van Wyck, Certified Health (Physicist)  
709 Helmsdale Place, North  
Brentwood, TN 37027

Tel. 615-373-9176

Stephen M. Sohinki, Director  
CLWR Project Office  
US Dept. of Energy  
PO Box 44539  
Washington, DC 20026-4539

Dec. 12, 1998

Dear Mr. Sohinki:

I received a phone call from someone in your office on Friday, 12/11, informing me that you plan to hold a hearing at the Rhea County High School in Evansville, TN on Monday, 12/14, regarding the proposal to manufacture tritium in one or more of the TVA Light Water Nuclear plants. I received a memo in the mail today (Saturday, 12/12) confirming the meeting.

It is not clear why this meeting is being held, particularly with such short notice. The EIS has not been completed to my knowledge. Therefore, the local residents who attend will not be adequately informed or be able to carry out any meaningful discussion about the project.

It is also not clear why such a "sudden" meeting has been called for this purpose. Since I feel it would be a serious mistake to manufacture tritium as proposed and I am strongly opposed to it, perhaps I was notified as an "after thought".

1/05.31

In any event, I cannot make the meeting at this time with such short notice. Therefore, I hurriedly prepared the attached letter to State Senator Gene Elsea, in whose district the meeting will be held, and handed it to him on Friday at his office here in Nashville. I hope that he, or a representative, will be able to attend and provide useful information from my perspective.

In the future, I request that you give at least two weeks notice of any planned meetings on this proposal so that plans can be made to attend.

Sincerely,

Robert W. Van Wyck, CHP

Commentor No. 248: Mayor Donald B. Clark

**Department of Energy  
Public Meeting  
December 14  
Rhea County High School  
on Watts Bar and Sequoyah  
nuclear power plants for the production of  
TRITIUM  
Comments of Donald B. Clark**

The Cumberland Countians for Peace & Justice, a coalition of individuals and religious congregations in neighborinmg Cumberland County, is an affiliate of Peace Action and, as you might suspect, is strongly opposed to the manufacture of tritium, period !! No where, no how!

1/01.01

On August 7, 1997, my testimony referred to National Council of Churches, World Council of Churches, Friends Committee on National Legislation, and United Church of Christ positions on nuclear weapons, the Plutonium Economy, and nuclear power. I concluded by saying that it can be safely said that THE MAINLINE RELIGIOUS COMMUNITY STANDS AGAINST ANYTHING THAT WILL EXTEND THE LIFE OF A NUCLEAR REACTOR, MAKE IT EVEN SLIGHTLY LESS UNECONOMIC TO OPERATE, DELAY ITS DEMISE, OR PUT IT ON ADDITIONAL WELFARE. We certainly would be opposed to the Department of Energy helping TVA complete a nuclear power plant. We view nuclear power as a "costly mistake" in the first place.

2/07.02

We have been working for years trying to stop the Department of Energy from building nuclear bombs, in Oak Ridge and elsewhere. We support the Nuclear Non-Proliferation Treaty, the Comprehensive Test Ban Treaty, no further nuclear testing of any kind and the rapid dismantlement of nuclear weapons. We do not believe that \$5 billion should be spent a year on our nuclear weapons arsenal, creating more deadly H bombs out of old ones. We believe the program is not politically appropriate, responsible, moral or logical.

3/02.01

4/23.13

5/01.10

In that testimony, we quoted from the June 1997 issue of PHYSICS TODAY that contained several articles on radioactive waste and nuclear safety, mentioning a 12 year tritium leak to groundwater from a spent fuel holding tank of a reactor at Brookhaven National Laboratory. I mentioned the public trust of the management of any nuclear reactor or research laboratory anywhere in the world is slim and justifiably should be nonexistent. The history of secrets, deceptions, denials and lies preclude trust and engenders anxiety. Those in the industry and the NRC are seemingly confident that nuclear science has the answers and must be pursued no matter what the costs. We consider this a faith based on self-dillusion and blind arrogance. Alternatively using the economic resources devoted to nuclear reactors and weapons, by the United States alone, for only a few

4(cont'd)

Commentor No. 248: Mayor Donald B. Clark (Cont'd)

months, could solve the world hunger and literacy problems and fund world wide environmental restoration. Redirecting the human resources of the nuclear and war industries to the meeting of creation needs is essential, in my view.

4(cont'd)

I conclude that testimony by claiming that NO ONE CAN JUSTIFY FURTHER TOXIC IMPACTS ON THIS REGION, citing several toxic impacts of Oak Ridge reported in the newspapers back in 1997. Since then the Tennessean newspaper has had several articles on the health of employees and area communities as well as a Special Report on the toxic impacts of nuclear and secondary sites accross the nation. An editorial on the date of the special report, September 29, 1998 is attached.

7/10.04

Copies of my testimony on August 7, 1997 and February 26, 1998, less several attachments, are also provided.

Thank you for the opportunity to present our views again.

  
Donald B. Clark

Since my last testimony, I have been elected Mayor of Pleasant Hill, TN and, in addition to involvements listed previously, have been added to the Steering Committee of the OBED Watershed Association and the Cumberland Chapter of Save Our Cumberland Mountains.

United Church of Christ, Network for Environmental & Economic Responsibility  
Donald B. Clark, Convenor P.O.Box 220, Pleasant Hill, TN 38578  
(931) 277-5467 Fax: 277-5593 clarkjd@multipro.com

Cumberland Countians for Peace & Justice  
Donald B. Clark, Chair of Steering Committee  
P.O.Box 220, Pleasant Hill, TN 38578  
(931) 277-5467 Fax: 277-5593 clarkjd@multipro.com



6/08.04



**NEER**

Network for Environmental  
and Economic Responsibility



United Church of Christ

**Commentor No. 249: Stephen A. Smith**

Forward Header

Subject: TVA and Tritium  
 Author: <sasmith@TnGreen.com>  
 Date: 12/17/98 10:44 AM

Steve,

I wanted to get the summary of my TVERC comments the other night.

1. We do see the need for Tritium at this time, DOE has not presented a compelling case for the need. **1/02.01**

2. We see the use of a CLWR as a clear violation of the non-proliferation treaty, no matter which reactor is chosen. **2/01.04**

3. We feel strongly that the Vice President's office has influenced this decision, and this will compromise his ability to stand before the world community in the future if elected to a higher office and argue against weapons of mass destruction. We see that he has been too involved in moving this TVA agenda. We will also work hard to expose his role both nationally and internationally if this goes forward in the coming months. **3/01.15**

4. Given the options of Bellefonte and Watts Bar, we see the Watts Bar option as the least environmentally destructive, given that Bellefonte is a "clean site". We also see Watts Bar has offering the greatest flexibility at the least cost given the future likelihood of addition weapons reductions.

5. We feel it has been a great miss characterization of the facts to say there is over whelming support for Bellefonte in Alabama. This is not true outside of those who have a direct economic benefit from the proposal. The fact that Alabama State Rep. John Robinson from Scottsboro was reelected by a 70-30 margin while he was vocal in his opposition to the Bellefonte proposal is clear evidence of this, and the closest thing to a citizen vote to date. We feel there is a large but not vocal opposition to Bellefonte and tritium in the community in Alabama. **4/07.08**

If these could be gotten directly to the Richardson that would be great, I have zero confidence that Sohinki can represent our view objectively.

Thanks for your help

Stephen A. Smith, DVM  
 Executive Director  
 TVERC

**Commentor No. 250: Oak Ridge Environmental Peace Alliance**

OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE  
 100 TULSA RD, SUITE 4A • OAK RIDGE, TN 37830 • 423 483 8202 • orep@igc.org

10 December 1998

The Honorable Bill Richardson, Secretary  
 The United States Department of Energy  
 1000 Independence Avenue, SW  
 Washington DC 20585

Dear Secretary Richardson:

We are writing to express in the strongest possible terms our opposition to the production of tritium for nuclear weapons in the Watts Bar, Sequoyah, and Bellefonte commercial nuclear reactors of the Tennessee Valley Authority or in a linear accelerator at Savannah River. We hold these strong beliefs for these reasons: **1/07.02**

**WE DO NOT NEED MORE TRITIUM**

According to DOE's own estimates, the US has enough tritium to last until 2016 (see the Tritium Programmatic Environmental Impact Statement).

**WE SHOULD END THE ARMS RACE, NOT PROLONG IT**

The proposed "need" for tritium is based on maintaining a huge START 1 arsenal well into the next century. This action, and its accompanying billion dollar price tag, is incomprehensible. The Department of Defense recently advocated deeper than START 2 cuts in the US arsenal. General Lee Butler, retired in 1994 as the head NATO strategic forces, has called for abolition. Former President Jimmy Carter has also called for steps to abolish nuclear weapons. Why is the Department of Energy proceeding to build up the arsenal? **2/02.02**

**MAKING TRITIUM IN COMMERCIAL REACTORS VIOLATES US POLICY**

The US has prevailed upon other nations to maintain a complete ban on the use of commercial facilities for military nuclear purposes. This ban is so thorough, the US can not purchase Uranium from foreign suppliers to make tritium in TVA reactors. Now the US proposes to unilaterally break the ban, sending a clear message to the rest of the world. **3/01.09**

**6/01.01**

Tim Proffitt  
Route 1, Box 221  
Decatur, Tn. 37322

**1/07.07**

Comment Documents

2-149

Commentor No. 252: Ned & Joyce Proffitt

December 15, 1998

U.S. Department of Energy  
 Commercial Light Water Reactor Project Office'  
 P.O. Box 44539  
 Washington, D.C. 20026-4539

Dear Mr. Sohinki and All I May Concern:

Please do not produce Tritium in the Tennessee Valley  
 and especially at Watts Bar and Sequoyah reactors.

1/07.07

I am not against protecting our country and being  
 ready to defend our country. Please consider there  
 are too many people down river from Watts Bar in  
 case of an accident. This is the water that most  
 people drink including Chattanooga.

2/15.03

Please do not contaminate the whole country. Leave  
 it in the Savannah River area that already has the  
 damage.

3/08.02

Please consider the lives of the people of the  
 Tennessee Valley.

1(cont'd)

Yours truly,

*Ned Proffitt*  
*Joyce Proffitt*  
 Ned Proffitt  
 Joyce Proffitt

cc: Zach Wamp, Congress  
 Al Gore, Vice President

Ned Proffitt  
 Route 1, Box 249  
 Decatur, Tn. 37322

Commentor No. 253: Kristina K. Stark**FAX COVER SHEET****FAX**

**OAKLEY HIGH SCHOOL**  
**118 W. 7TH**  
**OAKLEY, KS 67748**  
**785 [REDACTED]-672-3241**  
**FAX - [REDACTED]-672-3743**  
**785**

DATE: 1-18-99

TO: Commercial Light Water Reactor Project Office  
 Attn: Stephen Sohinki

FAX NO.: 1-800-631-0612

NO. PAGES:  
 INCL COVER PAGE

2

From: Oakley High Debate

Commentor No. 253: Kristina K. Stark (Cont'd)

We are members of the Oakley High School Debate Team from Northwest Kansas. As you may, or may not know, this year's debate topic deals with the United States and Russian foreign policy. We have encountered a proposal that seeks to import Russian tritium from nuclear reactors to meet United States defense needs. We realize that there may be a tritium shortage in the United States in the future, but we believe importing Russian nuclear by-products will have negative consequences. We are searching for information showing that the United States will be able to produce its own tritium supply for the future. We have read information on the APT project, and we believe that this may be a possible means of obtaining tritium. We would appreciate any information supporting the conclusion that the United States will be able to produce its own tritium. Thank you for your time.

*Kristina K. Stark*  
*Derek Lett*

1/01.14

Commentor No. 254: Petition

December 9, 1998

The Honorable Bill Richardson  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Dear Secretary Richardson:

RE: TRITIUM PRODUCTION

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2. PUBLIC POLICY

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- Only Bellefonte has strong organized labor support

3. TECHNICAL REASONS

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- Only Bellefonte would offer production flexibility with operating cycle lengths

4. ENVIRONMENTAL REASONS

- Bellefonte completion provides new electric power generation with no additional greenhouse emissions and supports recent Administration clean air initiatives

NAME

ADDRESS

<i>Paul B. Papp</i>	<i>OPS-2B Sequoyah</i>
<i>Paul L. Jackson</i>	<i>OPS-2B SEQUOYAH</i>

1/07.03

Comment Documents

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I(cont'd)

NAME	ADDRESS
RONNIEA CROSS	134 KENSINGTON DRIVE FLORENCE, AL
James Dillard	P.O. Box 1167 Florence, AL
Charles E. Frazier	842 North Hill Rd, Florence, AL
M. Diana Fink - Newletter	715 1/2 S. Washington St. Tusculum, AL

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I(cont'd)

NAME	ADDRESS
Angie Bellefonte	102 Co. Rd. 343, Moulton, AL 35660
Terrell McPeters	1270 W. Rexh Rd. Florence, AL 35633
Calvin L. Brantly	135 Brantly St. Lighthouse AL 35646
Jacque Anderson	305 Dowdy Ln. Florence, AL 35633



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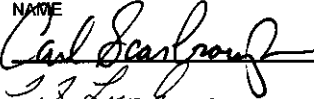
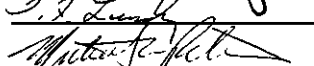
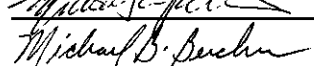
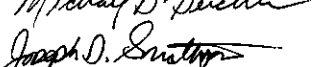
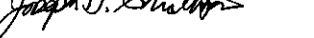
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	STC-25 SQN
	STC 25-SQN
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	STC-25-SQN

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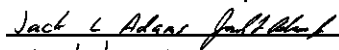

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NAME	ADDRESS
	6419 Sea Haven Drive Hixson TN 37343
	8260 Oakwood Dr., Union, TN 37343
	1151 Lakeside Circle, Hixson, TN 37343

I(cont'd)

***Commentor No. 254: Petition (Cont'd)***

December 9, 1998

ADDRESS

Kenneth D. Pulliam ~~Kenneth D. Pulliam~~ 6720 Harbor Circle Chattanooga, TN 37416  
Ronald R. Hughes ~~Ronald R. Hughes~~ 2337 Chimney Hills Rd. Soddy-Daisy, TN 37379  
Larry V. Mills ~~Larry V. Mills~~ 512 New Union Circle, Dayton TN 37521  
VONDA SISSON ~~Vonda Sisson~~ 3628 Waukena St, Chatt TN 37406  
Terry S. Orr ~~Terry S. Orr~~ 1845 Bay Hill Dr. Hixson TN 37343  
Brian Smrill ~~Brian Smrill~~ 707 Hunter Glen Dr. Chattanooga TN 37313  
David McInerney ~~David McInerney~~ 1920 Gunbarrel Rd #1005, Chattanooga, TN 37421  
Harold M. Jester ~~Harold M. Jester~~ 6410 Saw Pointe Ln. Hixson TN 37343  
John F. Thomas ~~John F. Thomas~~ 7507 HAVERTON CROSSING Hixson TN 37343

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NAME \_\_\_\_\_

ADDRESS

NAME	ADDRESS
Wayne L. Matthews	37859 Hwy 95 N, Ellettsville, In. 37742
Alfred P. Calk	5607 RIDGETOP RD KNOXVILLE TN 37921
Q. J. [Signature]	730 GERMANTOWN CO. EAST RIDGE, IN 37412

1(cont'd)

Commentor No. 254: Petition (Cont'd)

NAME	ADDRESS
<u>Thomas J. Sullivan</u>	<u>2000 Tanna Ave. CHATT TN</u>
<u>Donalf Sutton</u>	<u>6512 SPRINGWOOD DR. Hixson, TN</u>
<u>Joe G. Gacy</u>	<u>6605 HARKST RUN DR. Hixson, TN</u>
<u>Wm. J. Kagan</u>	<u>7701 Ridge Bay Drive, Hixson, TN</u>
<u>James K. Kell</u>	<u>1805 Jefferson Ln. Hixson, TN</u>
<u>B. Michael</u>	<u>1275 LEASIDE LN Hixson TN</u>
<u>El Wade</u>	<u>513 River Landing Dr. Saddy Daisy, TN</u>
<u>J. Woody</u>	<u>6447 RIDGE LAKE RD Hixson, TN</u>
<u>Francis Smith</u>	<u>277 Gholston Lane, Dayton, TN 37321</u>
<u>Ernest M. Shuffert</u>	<u>326 N. Knox Creek Rd. Sevierville TN</u>
<u>Frank T. Spaulford</u>	<u>8844 Wooten Rd. Chattanooga</u>
<u>Eric Payne</u>	<u>1810 Bladen) Park Rd. Hixson, TN</u>
<u>Blenda Hill</u>	<u>10005 Hixson Pike, Saddy-Daisy, TN</u>
<u>Nicholas Dallen</u>	<u>318 Union St. Saddy-Creek, TN</u>
<u>James F. Nichols Jr.</u>	<u>1576 Wetherburn Rd. Dayton TN</u>
<u>Harold L. Fleming</u>	<u>726 Creek Drive Chats. TN</u>
<u>Henry H. Hannon</u>	<u>1418 Pennac Cr. Hixson TN</u>
<u>Judy Collier</u>	<u>8925 Dunbar Hollow Rd. Saddy-Daisy, TN</u>
<u>John Collier</u>	<u>3106 Hawthorne Circle, East Ridge, TN</u>

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NAME	ADDRESS
<u>JOHN RATHBURN</u>	<u>16738 Moss Lake Dr. Hixson, TN 37343</u>
<u>Michael D. Stutz</u>	<u>49 Lakeside Dr., Scottsboro, AL 35769</u>
<u>W. Michael Hailley</u>	<u>530 Spring St., Signal Mtn. Tenn. 37377</u>

I(cont'd)

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NAME

ADDRESS

Randy Hartwig 1910 Cumberland Ave SW Decatur, AL 35603  
W. H. Hays 1215 Parkview Dr. Huntsville, AL 35890  
Bob Smith 2223 Victoria Dr Decatur, AL 35603

1(cont'd)

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Steven A. Taylor 2222 Essex Dr. SE, Norcross, AL 31207  
John W. Taylor 2309 WARWICK AVE SW, DECATUR, AL 35603  
John W. Taylor 607 DOGWOOD DR., DECATUR, AL 35603  
John W. Taylor 3530 Modans Rd., Decatur, AL 35603

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James H. Johnson MPB 1B-M  
Philip L. Lavelly MPB 1B-M

*1(cont'd)*

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Robert M. Chiga 24910 Co Rd 14 Florence, AL 35633  
C. M. Evans 778 Co. Rd. 584 Dugessville, AL 36352

*1(cont'd)*

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- Bellefonte completion provides new electric power generation with no additional greenhouse emissions and supports recent Administration clean air initiatives

I(cont'd)

NAME	ADDRESS
<i>Joseph D. Dwyer</i>	<i>836 Cumberland Road, Florence, AL 35630</i>
<i>Joan Kelly</i>	<i>2422 City Rd 103, Killeen, TX 76445</i>

Commentor No. 254: Petition (Cont'd)

December 9, 1998

The Honorable Bill Richardson  
Secretary of Energy  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Dear Secretary Richardson:

RE: TRITIUM PRODUCTION

We the undersigned have strongly supported and continue to strongly support tritium production at TVA's Bellefonte Nuclear Plant. For the past year we have put forth our energy toward the ultimate goal of the DOE selection of the Bellefonte option. All of our efforts (i.e., letter writing, contacting U.S. Representatives and Senators, opposing legislative language that would have eliminated use of Commercial Light Water Reactors, attending meetings, etc.) has been exerted only for Bellefonte. Had it not been for the efforts of people such as we, the Commercial Light Water Reactor option would not be available to DOE today. We continue to support only Bellefonte for the following reasons:

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- Only Bellefonte has strong local and state support
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NAME	ADDRESS
<i>DAVID P. BRANHAM</i>	<i>DPS-30, SEQUOIA NUCLEAR PLANT, SANDY SPRING, TN</i>
<i>Michael E. Anderson</i>	<i>124 Rockham Rd, Hickory, TN 37343 37379</i>

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NAME

ADDRESS

Louvin L. Edmondson Jr. 8235 Blue Spruce Dr. Hixson, TN 37343

*1(cont'd)*

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William David Herston CTR1D/M

*1(cont'd)*

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NAME

ADDRESS

<u>Wayne Smith</u>	<u>3906 WINDWARD LN.</u>
	<u>Soddy-Daisy, TN. 37379</u>
<u>Cal Underwood</u>	<u>2304 Clearview Pl.</u>
	<u>Decatur, AL 35601</u>

I(cont'd)

Commentor No. 254: Petition (Cont'd)

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NAME

ADDRESS

<u>William J. Dell</u>	<u>915 Tennessee Avenue, Athens, TN 37103</u>
<u>John H. J.</u>	<u>3906 Byrdstown Hwy, Monroe Tn 38573</u>
<u>John C. G. Smith</u>	<u>232 Rush Rd. Crossville, TN 38555</u>

I(cont'd)



Commentor No. 255: Petition

December 14, 1998

To: Secretary of Energy Bill Richardson, Congressman Zach Wamp  
Congressman Van Hillary, Senator Bill Frist, Senator Fred Thompson  
Vice-President Al Gore, President Bill Clinton

We, the undersigned, are residents of Tennessee, and we are totally opposed to the production of tritium at the Watts Bar Nuclear Facility. We do not want the production of tritium in our area. Thank you for your support in this matter.

1/07.07

1. Margaret Brooks 1268 Dumas Rd. Chattanooga TN 37405 Margaret Brooks
2. Matt Long 615 Bob Long Rd Dayton TN 37321
3. Dede Jones 1746 Riverpoint Rd Dayton TN Dede Jones
4. Gary Smith 444 Evergreen Dayton TN
5. Linda Smith 444 Evergreen Dayton TN
6. Beery Earles 457 Pine Hollow Rd. Dayton, TN
7. Anna Wilcox 537 Evergreen. Dayton, TN.
8. Barbara Simpson 1530 Riverpoint Rd. Dayton, TN 37321
9. Amy Earles 457 Pine Hollow Rd. Dayton, TN 37321
10. Mary Parr 263 Bales Landing Dayton TN 37321
11. Charlotte Johnson Oak Street Dayton, TN 37321
12. Deandra Newman 330 Highland Dr. TN 37321
13. ~~Deandra Newman~~ 330 Highland Dr. TN 37321
14. John McMorris 161 Oak St. #2 Dayton, TN 37321
15. Pat Best 1488 Barrett Ave. Dayton, TN 37321
16. May Mac Book 1368 Market St #101 Dayton TN 37321

Commentor No. 255: Petition (Cont'd)

December 14, 1998

To: Secretary of Energy Bill Richardson, Congressman Zach Wamp  
Congressman Van Hillary, Senator Bill Frist, Senator Fred Thompson  
Vice-President Al Gore, President Bill Clinton

We, the undersigned, are residents of Tennessee, and we are totally opposed to the production of tritium at the Watts Bar Nuclear Facility. We do not want the production of tritium in our area. Thank you for your support in this matter.

1(cont'd)

17. Catherine McDonald 1746 Riverpoint Road Dayton TN 37321
18. Ann Simpson 1530 Riverpoint Rd. Dayton TN 37321
19. Robert Simpson 1530 Riverpoint Rd Dayton TN 37321
20. Susan Simpson 1530 Riverpoint Rd Dayton TN 37321
21. Robin Lukeman

Commentor No. 255: Petition (Cont'd)

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 Congressman Van Hillary, Senator Bill Frist, Senator Fred Thompson  
 Vice-President Al Gore, President Bill Clinton

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I(cont'd)

*Dana Ashmore, 135 Tom Garrison Rd., Evansville, TN 37332*  
*Charles Ashmore, 755 Tom Garrison Rd., Evansville, TN 37332*  
*Granddad 166 Lamplighter Ct. Dayton, TN 37321*  
*Yvonne West 1305 Shaverhook Rd Dayton TN 37321*  
*Bill Johnson 672 Pine Hill Dr. Dayton, TN 37321*

**Commentor No. 147: Petition**

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

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1/07.03

OPEIU International

International Association of Machinists and  
Aerospace Workers

*Colin Underwood*  
Engineering Association

*Turner*  
International Union of Operating Engineers

*Bill Mahoney*  
International Association of Heat and Frost  
Insulators and Asbestos Workers

*Mitchell Weir*  
International Brotherhood of Painters and  
Allied Trades

*Steve Gaskill*  
International Brotherhood of Boilermakers,  
Iron Ship Builders, Blacksmiths

Operative Plasterers' and Cement Masons'  
International Union

Forgers and Helpers - International Union of  
Bricklayers and Allied Trades

*Sharon*  
United Association of Journeymen and  
Apprentices of the Plumbing and Pipe  
Fitting Industry

*W.F. Duffin*  
United Brotherhood of Carpenters and  
Joiners of America

United Union of Roofers, Waterproofers and  
Allied Workers

*Carl Snodgrass*  
International Brotherhood of Electrical  
Workers

*A. Carl*  
Sheet Metal Workers' International  
Association

*Malvin L. Brewer*  
International Association of Bridge, Structural  
and Ornamental Iron Workers

*Michael A. Fendrich*  
International Brotherhood of Teamsters

*Stephen E. Lamm*  
Laborers' International Union of North  
America

**Commentor No. 147: Petition (Cont'd)**

**DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

**USES OF TRITIUM**

Tritium is a radioactive isotope of hydrogen. If not properly controlled it can be dangerous, but when controlled properly is safe and can save lives. Tritium is:

- Used for life science and drug metabolism studies to ensure the safety of potential new drugs
- Used for self-luminous aircraft and commercial exit signs
- Used for luminous dials, gauges and wrist watches
- Used to produce luminous paint
- Used in Doppler Radar
- Used as a triggering component (i.e., boosts yield) in nuclear weapons

1(cont'd)

**NONPROLIFERATION ISSUES**

(Nonproliferation is defined as preventing the increase or spread of nuclear weapons)

Interagency Review of Nonproliferation Implications concerning tritium production was completed on July 14, 1998 and concluded the following:

- Nonproliferation policy issues associated with a Commercial Light Water Reactor (CLWR) are manageable and DOE should continue to pursue the CLWR option.
- No legal or treaty prohibitions against tritium production in a CLWR.
- Many exceptions have been made over the years to separation of civilian and military use of nuclear energy.
- Reactors producing tritium can remain on IAEA Safeguards List.
- No bilateral "peaceful uses" agreements will be violated. Reactors making tritium will use U.S. - origin uranium fuel.
- TVA's charter gives it a national security responsibility.

A House of Representatives Task Force (chaired by Lindsey Graham of South Carolina) issued a report to the Speaker of the House in 1995 concluding:

- Production of tritium in a commercial reactor is not a proliferation concern.
- Producing tritium in a reactor is no different than producing tritium in an accelerator.
- Raising nonproliferation concerns is simply an argument to sell the accelerator option.

Bellefonte would be operated as a electrical power generation facility with the ability to provide DOE with irradiation services for tritium production.

**Commentor No. 147: Petition (Cont'd)**

**ISSUES REVIEWED BY EIS**

- Land use
- Visual Resources
- Air Quality
- Water Quality and Use
- Archeological and historic resources
- Biotic (living things) resources including threatened and endangered species
- Socioeconomics (interaction of social and economic factors)
- Public and Worker Health and Safety

**ENVIRONMENTAL IMPACTS OF OPERATION OF BELLEFONTE REACTORS**

- EIS verifies that the incremental impacts of producing tritium in a commercial reactor are small with no measurable health effects.
- No air quality standards will be exceeded.
- No impacts to threatened or endangered species are expected.
- There will be a visual impact from the cooling tower vapor plume.
- Minimal impact on Gunter'sville Reservoir (0.2% of the flow).
- Minor impacts to aquatic resources from impingement in cooling water intake screens.
- Positive socioeconomic impacts
  - 800 Bellefonte workers
  - Up to 800 indirect jobs
  - Unemployment rate would stabilize approximately 2 % below current levels.

**RADIATION EXPOSURE**

**SOURCES OF PUBLIC RADIATION EXPOSURE**

- Natural Radon - 200 millirems per year
- Cosmic Radiation - 28 millirems per year
- Terrestrial - 28 millirems per year
- Internal (your own body)- 39 millirems per year
- Medical X-Ray - 39 millirems each time
- Nuclear Medicine - 14 millirems each use
- Drinking Well Water - 1 to 6 millirems per year
- 5 Hour Airplane Flight - 2.5 millirems
- Eating Food Grown with Phosphate Fertilizers - 1 to 2 millirems per year
- Wearing porcelain dental crowns or dentures - 0.7 millirems per year
- Cooking with Natural Gas - 0.4 millirems per year
- Bellefonte Reactor Operation with Tritium Production - 0.32 millirems per year
- Bellefonte Reactor Operation - 0.26 millirems per year

*I(cont'd)*

**Commentor No. 147: Petition (Cont'd)**

**PUBLIC RADIATION EXPOSURE COMPARISON**

- Average U.S. resident (Background) - 363 millirems per year
- Resident of Denver, Colorado (Background) - 442 millirems per year
- Resident of Jackson County, AL (Background) - 355 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation) - 355.26 millirems per year
- Resident of Jackson County, AL (Background plus Bellefonte Reactor Operation with Tritium Production) - 355.32 millirems per year

**CONCLUSION: BELLEFONTE SHOULD BE THE PREFERRED ALTERNATIVE!**

The draft CLWR EIS does not identify a preferred alternative for producing tritium. A no action alternative is for DOE to build an accelerator in South Carolina. After reviewing the draft EIS and comparing the potential impacts associated with the alternatives, including the no action alternative, we believe that the **preferred alternative should be identified as any alternative that includes Bellefonte**. This belief is based on the following:

- Negligible environmental impacts with no measurable health effects.
- Positive socioeconomic impacts supporting economic growth and development
- Flexible tritium production capacity to meet changing tritium needs
- Proven technology compared to the No Action alternative
- No proliferation issues that are not manageable under existing laws and controls associated with CLWRs
- Least Total Life Cycle Cost

# Commentor No. 147: Petition (Cont'd)

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Signature	Address
<u>Robert B. Godwin</u>	<u>2807 McIntosh Ave SW, Decatur, AL 35607</u>
<u>W. E. Ehl</u>	<u>912 Delores Dr. Hixson, TN 37343</u>
<u>John R. Balthus</u>	<u>334 Co Rd 565 TOWN CREEK, AL 35672</u>
<u>Gene V. Hixson</u>	<u>3031 OLD MOULTON RD Decatur AL 35603</u>
<u>Alan Hix</u>	<u>1813 LINGERLUST ROAD, KILLAM, AL 35644</u>
<u>Kerry Moody</u>	<u>20196 Chickasaw Dr., Athens, AL 35613</u>
<u>Dennis Mott</u>	<u>565 CONGRESS ST. SCHENECTADY, NY 12303</u>
<u>D. A. Perry</u>	<u>84 OLOVBLUNDPAN RO NORWICH, CT 06460</u>
<u>Robert R. Smith</u>	<u>2601 E Hartford St 18 Hernando FL 34442</u>
<u>W. E. Ehl</u>	<u>771 Cornelia Dr, HSV, AL 35802</u>
<u>C. W. Foland</u>	<u>313 HUXLEY RD, Knoxville TN 37922</u>
<u>Wm. S. G. G. G.</u>	<u>13500 Hitchie Lane, Athens, AL 35611</u>
<u>Paul W. Whitaker</u>	<u>607 River Winds Ln, Hixson, TN 37343</u>
<u>Charles T. Gandy</u>	<u>1605 W MARKET ST ATHENS AL 35614</u>
<u>Mike Z. Park</u>	<u>26185 EASON FORT RD, E. KNOX AL 35620</u>
<u>John W. Gandy</u>	<u>464 S. LIMEADOW RD Somerville AL 35670</u>

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<u>Ronald D. Phillips</u>	<u>320 Oak St. N.E. Decatur, AL</u>
<u>Rodger L. Douglas</u>	<u>1604 Wellington Ct SE, Decatur, AL 35601</u>
<u>Michael P. Hixson</u>	<u>616 N. Beacon Drive, Hixson, TN</u>
<u>James D. Hixson</u>	<u>213 LINGERLUST DR. KILLAM AL 35644</u>
<u>Dr. H. O. Hix</u>	<u>7629 Hunter Rd. Hixson, TN 37343</u>
<u>William L. Aldridge</u>	<u>1814 SHERWOOD DR. SE, DECATUR AL 35601</u>
<u>Fred E. Hixson</u>	<u>111 LAWRENCE WALL DR. HUNTSVILLE, AL 35896</u>
<u>R. C. Hixson</u>	<u>1309 GARTH AVE, DECATUR, AL 35601</u>
<u>Gina Cummins</u>	<u>114 MICHLI RD, MADISON, AL 35758</u>
<u>Stephen H. McRight</u>	<u>1918 S. Beechwood Dr FLORENCE AL 35630</u>
<u>Andy G. Hixson</u>	<u>21 Powell Circle Five As TN 38457</u>
<u>Stephen B. Blackburn</u>	<u>1952 County Road 53, Rossburg, AL 35652</u>
<u>Philis Davis</u>	<u>115 Progress Lane Madison, AL 35758</u>
<u>Harland Dorton</u>	<u>106 Chiving Cross, Florence, AL 35133</u>
<u>James A. Hixson</u>	<u>142 Co Rd 53 Rossburg, AL 35652</u>
<u>Dan Hix</u>	<u>405 Louise St Florence AL 35630</u>

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Signature	Address
<i>[Signature]</i>	876 Spring Cove Rd., Florence AL 35634
<i>[Signature]</i>	16189 E. Glenn Valley Dr Athens AL 35611
<i>[Signature]</i>	3504 Co. Rd 136, Town Creek Ala
<i>[Signature]</i>	201 BIRCH RUN, FLORENCE, AL 35630
<i>[Signature]</i>	17355 HOLLAND HTS ATHENS, AL 35213
<i>[Signature]</i>	9360 Mitchell Bend Ct. Gwynn Bay, TX 76048
<i>[Signature]</i>	6722 STONEMASON DR. HUNTSVILLE, AL 35896
<i>[Signature]</i>	363 CR 172 INLA, MS 38852
<i>[Signature]</i>	125 Royal Dr apt 2609 MADISON, ALA 3758
<i>[Signature]</i>	9404 St Holden Ln Athens, AL 35614
<i>[Signature]</i>	102 Buchanan St. Morrilton AR 72110
<i>[Signature]</i>	1806 FIDUCIARIA, PRISPECT, TN 35477
<i>[Signature]</i>	400 E Maple St Muscle Shoals AL 35661
<i>[Signature]</i>	102 PENNIE TRACE ATHENS, AL 35613
<i>[Signature]</i>	127 SPRINGWATER MADISON, AL 35758
<i>[Signature]</i>	98 ALISSA LANE, GRANT, AL 35747
<i>[Signature]</i>	1202 Byron Ave SW, Decatur, AL 35601

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Signature	Address
<i>[Signature]</i>	15023 LEAFMORE DR. HSV. AL 35603
<i>[Signature]</i>	3555T Grant Road, Florence, AL 35634
<i>[Signature]</i>	103 Springwood Cir. HSV., AL 35803
<i>[Signature]</i>	823 Many Lee Dr Florence AL 35634
<i>[Signature]</i>	180 YALBY RD MADISON, AL 35758
<i>[Signature]</i>	8736 Co Rigg Stevens, AL 35772
<i>[Signature]</i>	12255 Lakens Way Athens, AL 35611
<i>[Signature]</i>	114 Evergreen Drive Florence AL 35634
<i>[Signature]</i>	133 Parker Drive Florence, AL 35633
<i>[Signature]</i>	119 MATT PHILLIPS RD HUNTSVILLE AL 35890
<i>[Signature]</i>	603 Auburn Ave Huntsville, AL 35891
<i>[Signature]</i>	501 RD 8039 FLORENCE AL 35630
<i>[Signature]</i>	135 CR 81 Florence, AL 35633
<i>[Signature]</i>	12104 Lakens Way ATHENS AL 35611
<i>[Signature]</i>	2201 Duncansley, ESE, Decatur, AL 35603
<i>[Signature]</i>	200 Barnyard Blvd Florence, AL 35634
<i>[Signature]</i>	706 Ashley Dr. SW. Decatur, AL 35601

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I(cont'd)

Signature	Address
<i>Debra H. Hendry</i>	510 Jenkins Simpsonville, S.C.
<i>Gregory Johnson</i>	1753 E Moore St. Southport NC
<i>Samuel J. Sharp</i>	P.O. BOX 331 LEXINGTON AL
<i>B.T. Henson</i>	227 HARBOR DRIVE P.O. Box 218 Spring City, TN 37381
<i>Robert Johnson</i>	6346 Bowling Green rd SCOTTSVILLE Ky 42164
<i>Raul M. Tillet</i>	1 JASPER PROVIDENCE RI 02904
<i>David H. Armstrong</i>	27 VARICK ST. OSWEGO, NY 13126
<i>David L. Kelly</i>	PO BOX 3094 OSWEGO NY 13126
<i>Dr. Charlotte Abbott</i>	6461 Oak Ridge Rd, Vickburg, MS 39180
<i>David C. Venter</i>	1201 Riverfront PKWY Chattanooga TN 37402
<i>Frederick W. Griswold Jr.</i>	2004 Lancaster Ave S.W. AL 35603
<i>Zhores L. Stetsko</i>	2520 MAHALA L.L. CHATTANOOGA, TN 37421
<i>Robert A. Smith</i>	5435 Ricks Lane Tusculum AL 35674
<i>Ray Allen</i>	9534 Hwy 12 Flo. AL 35634
<i>Michael G. Jones</i>	103 2nd AVE S Louisville, TN 38469-4122
<i>Dana Mitchell</i>	360 Paint Rd. Muscle Shoals, AL 35661
<i>Theresa Mitchell</i>	55 Co Rd 317 Florence, AL 35634

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

4

## Commentor No. 147: Petition (Cont'd)

### AN ASSESSMENT OF THE DRAFT CLWR EIS FOR TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

We, the undersigned, have reviewed the draft Environmental Impact Statement (EIS) for the production of tritium in a Commercial Light Water Reactor (CLWR) dated August 1998. We find the proposed tritium production program to be environmentally safe and to produce no measurable health effects. In addition, we conclude that Bellefonte Nuclear Plant should be named in the EIS as the preferred alternative based on its least life cycle cost to the U. S. taxpayer and the positive socioeconomic effects of the project. A summary of the primary points from the draft EIS used to reach this conclusion are shown on the attached pages.

I(cont'd)

Signature	Address
<i>Robert H. Hendry</i>	8927 S. East Ave Ave Chicago, IL 60627
<i>Samuel J. Sharp</i>	222 S. 1st St. #84, Madison, AL 35758
<i>David Westwood</i>	1135 East Jefferson St. Pulaski, TN 38478
<i>Barry D. Faler</i>	2506 Spring Ave #10 Decatur, AL 35601
<i>Richard R. R.</i>	1141616th St. Dunnington PA 16844 Douglas DE-ATLANTA AL
<i>Colleen C. Smith</i>	301 County Rd 97 Rogersville, AL 35602
<i>John H. H.</i>	11344 Conard Rd. Athens AL 35611
<i>Rob Thompson</i>	105 Park Terrace Sheffield AL 35660
<i>Michael Briggs</i>	1306 Cantwell Ave S.W. Decatur AL 35601
<i>Greg Ezell</i>	522 County Rd 52 Anderson AL 35610
<i>David L. Tilton</i>	1347 Richmond Drive Melbourne FL 32935
<i>Earl R. R.</i>	1700 31st ST SHEFFIELD, AL 35660
<i>Angie Thom</i>	686 Brown Rd. Demville AL 35619
<i>Walter L. L.</i>	1346 Water Tank Rd. Union Grove AL 35175
<i>Ray R. Mitchell</i>	775 Co Rd 489 Lexington AL 35648
<i>Jim F. M.</i>	1701 Co Rd 122 1/2 Florence AL 35634
<i>Marilyn J. S.</i>	1050 Harborview N.E. Decatur, AL 35601

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

4

Commentor No. 147: Petition (Cont'd)

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
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1(cont'd)

Signature	Address
<u>Billy R. Mable</u>	<u>1945 Caplin Dr. Florence, Ala. 35630</u>
<u>William Howell</u>	<u>P.O. 25 Rogersville, AL 35652</u>
<u>Danna T. Crunk</u>	<u>61 Kimberly St. Decatur, Ala. 35603</u>
<u>Randy Sumlin</u>	<u>Rt. 2 Box 948 Corinth, MS. 38834</u>
<u>Mike Cotton</u>	<u>9111 Hwy 92 West Athens AL 35611</u>
<u>William J. Bailey</u>	<u>2561 County Rd 21 Killen, AL 35645</u>
<u>Tom A. Balch</u>	<u>15443 Arlington Rd Athens, AL 35611</u>
<u>Jeffrey Quinn</u>	<u>80 Bridge Circle Killen AL 35645</u>
<u>James Walker</u>	<u>2900 RD 586 Rogersville AL 35652</u>
<u>Samuel R. Phillips</u>	<u>1247 Green Branch Ln. Hixson, TN 37343</u>
<u>Donald Finley</u>	<u>10268 Hwy 75 Russellville AL 35652</u>
<u>Warren Sketon</u>	<u>13000 Hwy 72 Rogersville, AL 35652</u>
<u>Dwight Collier</u>	<u>210 Gunterville St Sheffield, AL 35660</u>
<u>Julie Brown</u>	<u>13030 County Road 1 Muscle Shoals 35661</u>
<u>James J. Roaf</u>	<u>208 S. Anderson Rd. Meridianville, AL 35759</u>
<u>Joan M. Mitchell</u>	<u>615 Lake Six Rd Killen, AL 35645</u>
<u>Robert T. Shellen</u>	<u>600 Camp Rd 470 Lexington AL 35649</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

Commentor No. 147: Petition (Cont'd)

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1(cont'd)

Signature	Address
<u>William S. Low</u>	<u>5555 Weakley Creek Rd Lawrenceburg, TN 38464</u>
<u>Paul G. Sketon</u>	<u>21545 Upper Ft. Hampton Rd Elkin, TN 35620</u>
<u>Larry W. Hester</u>	<u>1101 Buena Vista Muscle Shoals Ala 35661</u>
<u>Bobby R. Brown</u>	<u>6695 Woodmont Dr Tusculum, AL 35674</u>
<u>Wayne Andrews</u>	<u>204 TUBBS ROAD RUSSELLVILLE AL 35654</u>
<u>Bonnie M. Allen</u>	<u>1501 Hwy 49 Russellville AL 35653</u>
<u>James C. Gay</u>	<u>2213 Brighton St. SW Decatur, AL 35603</u>
<u>Walter H. Smith</u>	<u>19 Poplar Russellville, AL 35653</u>
<u>Jimmy L. Hark</u>	<u>617 Hwy 4 Vina AL 35593</u>
<u>Thomas Meadows</u>	<u>14247 ELLIS LANE LESTER, AL 35647</u>
<u>Charles E. Bell</u>	<u>19291 Hwy 52 S. W. TANNER, AL 35671</u>
<u>Richard Stump</u>	<u>108 County Rd 355 Florence AL 35634</u>
<u>Jimmy Lee</u>	<u>105 Quail Dr Gadsden, AL 35464</u>
<u>Samuel Thomas</u>	<u>1551 CR 430 Lexington, AL 35648</u>
<u>James H. Smith</u>	<u>1214 CAMPYVOUND CIR. SCOTTSBORO, AL 35769</u>
<u>Billy Garrett</u>	<u>3401 Tarpley Shop Rd Palaski TN 38478</u>
<u>John Brown</u>	<u>100 Ben Franklin Cir Madison AL 35758</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998



### Commentor No. 147: Petition (Cont'd)

#### AN ASSESSMENT OF THE DRAFT CLWR EIS FOR TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

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1(cont'd)

Signature

Address

<u>Dan M. Lefler</u>	<u>371 LEONA DR. FLORENCE, AL 35633</u>
<u>Jim M. White</u>	<u>P.O. Box 1535 DECATUR AL 35602</u>
<u>Elizabeth White</u>	<u>920 W. MOBILE ST. FLORENCE, AL 35630</u>
<u>Jimmy Tate</u>	<u>102 DOUGLAS ST. MADISON, AL 35758</u>
<u>Charles E. Parnham</u>	<u>2329 PALM AVE S.E. CULLMAN AL 35555</u>
<u>Susan Combs</u>	<u>9386 Poplar Pt. Athens AL 35611</u>
<u>Paul Bradley</u>	<u>1402 EDWARDS MUSCLE SHOALS AL 35661</u>
<u>Kipster Menden</u>	<u>1700 CO RD 76 ROGERSVILLE, AL 35652</u>
<u>Keith Collins</u>	<u>4780 CO RD 76 ROGERSVILLE, AL 35652</u>
<u>Walter H. Hays</u>	<u>1014 SHERMAN MADISON, AL 35758</u>
<u>Dan C. Bell</u>	<u>FLYING <sup>STONE</sup> APT 215 MADISON AL 35758</u>
<u>Billy R. Lippert</u>	<u>1423 HENDERSON POINT RD TUSCUMBIA, AL 35674</u>
<u>John M. Kallen</u>	<u>262 Oakview Circle KILLEN, AL 35645</u>
<u>James H. Bantle</u>	<u>1902 CO RD 124 Florence, AL 35633</u>
<u>Delbert Bassum</u>	<u>1413 Martin Henry AL 35630</u>
<u>Donna L. Lippert</u>	<u>15484 COWESSA DR. Athens AL 35611</u>
<u>John L. Lippert</u>	<u>1378 COUNTY RD 36 KILGORE AL 35645</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

### Commentor No. 147: Petition (Cont'd)

#### AN ASSESSMENT OF THE DRAFT CLWR EIS FOR TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

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1(cont'd)

Signature

Address

<u>Rodney E. Hadden</u>	<u>Box 434 County Rd 442 Killen, AL 35645</u>
<u>T. J. Thompson</u>	<u>2307 E. 4th St. Mobile, AL 35682</u>
<u>Bob L. Lippert</u>	<u>714 W. Alabama St. Florence, AL 35630</u>
<u>John L. Lippert</u>	<u>12152 CR 706 47 FLORENCE AL 35634</u>
<u>Vincent R. Lippert</u>	<u>160 Wagon Dr Tusculumbia al 35674</u>
<u>Helene Eaton</u>	<u>15139 7-MILE Post Rd. Athens, AL 35611</u>
<u>Ernest Greaney</u>	<u>1035 CO RD 142 Florence, AL 35634</u>
<u>David Bull</u>	<u>4810 Keith Rd Ringgold GA 30776</u>
<u>Paul L. Lippert</u>	<u>922 County Rd 425, Killen, AL 35645</u>
<u>Thomas W. Ken</u>	<u>15125 Hobbs Rd, Athens, AL 35614</u>
<u>Dandra K. Woody</u>	<u>521 Lawson St., Athens, AL 35611</u>
<u>Karl L. Lippert</u>	<u>18021 Cox Rd Athens, AL 35611</u>
<u>W. J. Lippert</u>	<u>2515 Mass. Rd. Athens, AL 35611</u>
<u>Jim Lippert</u>	<u>232 Francis Dr Killen AL 35645</u>
<u>Michael Lippert</u>	<u>249 CR 442 Killen AL 35645</u>
<u>Ronald L. Lippert</u>	<u>617 South Tinde Street Florence AL 35630</u>

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Commentor No. 147: Petition (Cont'd)

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1(cont'd)

Signature	Address
<u>Paul H. Martin</u>	<u>102 Jefferson St. Florence, AL 35630</u>
<u>Mary B. Skerrod</u>	<u>1701 E. 32nd St. Sheffield, AL 35660</u>
<u>Jack Watson</u>	<u>501 Shoal Creek Rd. Hartselle, AL 35640</u>
<u>Mary Goodwin</u>	<u>P.O. Box 5075 Huntsville, AL 35895</u>
<u>Angie J. Lee</u>	<u>7231 Daniel Dr. Auburn, AL 36813</u>
<u>Frank L. Lough</u>	<u>6010 DOGWOOD DR. HARKLEY, TN. 37241</u>
<u>Robert L. Klym</u>	<u>9143 Hawkins Dr. Athens, AL 35611</u>
<u>Jim Turner</u>	<u>687 Cambridge Dr. Madison, AL 35758</u>
<u>Donna Hardy</u>	<u>855 Raintree Drive Tusculum, AL 35674</u>
<u>Edna Spivey</u>	<u>106 Brady St. Tusculum, AL 35674</u>
<u>James H. Jordan</u>	<u>1703 IRIS ST. SW DECATUR AL 35601</u>
<u>James A. Johnson</u>	<u>1210 GARTH A. SW DECATUR AL 35601</u>
<u>Dennis J. O'Leary</u>	<u>220 COBBLE HILL AL 35645</u>
<u>Carol M. Ponder</u>	<u>1310 Runnymede Ave SW Decatur, AL 35601</u>
<u>Danny Baklander</u>	<u>3308 Cedar Cove SW Decatur, AL 35603</u>
<u>Jim Nantz</u>	<u>205 Sunset Dr. Athens, AL 35611</u>

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1(cont'd)

Signature	Address
<u>Dulant Ulathe</u>	<u>25343 Magnwood Dr, Athens AL 35611</u>
<u>Dennis Maffield</u>	<u>205 Mackaleys Dr, Florence, AL 35630</u>
<u>Judy Evans</u>	<u>16559 Evans Rd. Athens, AL 35611</u>
<u>Lorinda M. Meach</u>	<u>109 Joe Run Florence, AL 35633</u>
<u>Jimmy C. Peltot</u>	<u>4407 Danville Rd. Decatur AL 35603</u>
<u>John H. White</u>	<u>130 Christopher Circle. Athens AL 35611</u>
<u>Jimmy Hudgins</u>	<u>10127th Ave SE, Decatur AL 35601</u>
<u>Deborah Brown</u>	<u>3382 Outry Rd. SO Rogersville, AL 35652</u>
<u>D. G. Buggs</u>	<u>201 N.E. Commons, Tusculum, AL 35674</u>
<u>Jimmy Cartwright</u>	<u>2028 Langlot Dr. Decatur, AL 35603</u>
<u>A. D. Dutton</u>	<u>891 Mesquite Ln Rd. Brownsboro, AL 35741</u>
<u>Elaine Reese</u>	<u>206 Gordon Drive Athens, AL 35611</u>
<u>Stephen K. Hogan</u>	<u>349 County Road 396 Kellow, Alabama 35645</u>
<u>Donald H. Harts</u>	<u>7792 Con Rd 136 Tam Creek AL 35672</u>
<u>James Brown</u>	<u>164 Cove Court Florence, AL 35634</u>
<u>George J. Ballou</u>	<u>3202 Sweetbriar Road SW, Decatur, AL 35603</u>

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# Commentor No. 147: Petition (Cont'd)

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1(cont'd)

Signature	Address
<i>John E. Williams</i>	1125 County Rd 66 Anderson AL 35610
<i>Wayne H. Thompson</i>	25535 Cypress Rd Athens AL 35613
<i>Ray L. Jeff</i>	271 Ridge Rd Killen, Ala. 35645
<i>W. B. Cook</i>	1636 Iron Man Rd. Hartselle, Ala. 35640
<i>Bill Rogers</i>	606 Ric. H. T. Ave Muscle Shoals AL
<i>Mike Miller</i>	1404 Parsons St Sheffield AL
<i>David Hunter</i>	8204 County Rd 475 Killen AL 35645
<i>Thomas G. Sed</i>	3849 County Rd 47 Florence AL 35630
<i>Lee Smith</i>	212 1st St Thomas AL 35688
<i>D. H. Hines</i>	1962 Caples Dr. Florence AL 35630
<i>Edmund M. Hines</i>	9900 Upper State Rd Athens AL 35614
<i>Ronald Salmon</i>	614 Butler Mill Rd Woodville AL 35676
<i>James Brackley</i>	2402 Hammer Dr Hartselle, AL 35640
<i>Don Moore</i>	607 1/2 Winchester Rd Huntsville AL 35811
<i>Michael R. Black</i>	800 Vantage Bdg Rd. Hartselle, AL 35640
<i>P. S. Pugh</i>	191 Riverside Dr Florence, AL 35630

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Signature	Address
<i>Robert E. Powell</i>	1407 Alpinia St SE Decatur AL
<i>Tom W. Hester</i>	865 1st St SE Killen AL 35645
<i>James S. Hester</i>	377 W. Rd. 33 Killen AL 35645
<i>Thomas E. Hester</i>	175 Hardy Rd Pulaski TN 38478
<i>James H. Hester</i>	20440 1st St SE Florence AL 35633
<i>William P. Hines</i>	104 Big Oak Circle Hartselle, AL 35645
<i>Edward G. Brown</i>	314 Central Ave Moundville AL 35661
<i>Robert E. Hester</i>	P.O. Box 836 Killen, AL 35645
<i>W. B. Black</i>	17375 Martin Dr. Athens, AL 35611
<i>Charles E. Hester</i>	816 Smith Ave. Decatur, AL 35603
<i>Tom W. Hester</i>	11438 Hwy 64 East Lexington AL 35648
<i>E. S. Hester</i>	582 Co. Rd 107 Killen AL 35645
<i>William W. Hester</i>	344 Killen Ham Rd Florence, Alabama 35630
<i>Colin M. Hester</i>	491 Meadows Square Lane Florence, AL 35633
<i>James Hester</i>	200 James St Muscle Shoals AL 35631
<i>John Hester</i>	1045 GR 411 KILLEN, AL 35645

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Signature

Address

<u>Keith M. Carley</u>	<u>1315 Rook Rd N.E., Marietta, AL 35640</u>
<u>Cecil R. Rice</u>	<u>906 E. Moss Ave Muscle Shoals AL 35661</u>
<u>Daniel A. White</u>	<u>713 West Lakeside Florence AL 35630</u>
<u>Harold Hall</u>	<u>495 County Road 544 Rogersville AL 35652</u>
<u>Julian Sosa</u>	<u>P.O. Box 114 Rogersville AL 35652</u>
<u>David L. Hume</u>	<u>2772 McHenry Lake Cherokee AL 35606</u>
<u>Sharon Johnson</u>	<u>P.O. Box 474 Killen, AL 35645</u>
<u>W. E. Walden</u>	<u>#40 Betsy Ross Lane Florence ALA. 35633</u>
<u>Jack K. Raich</u>	<u>100 Ben Franklin Cir. Madison AL 35758</u>
<u>Joseph P. Dutton</u>	<u>P.O. Box 836 Killen AL 35645</u>
<u>Jimmy W. Taylor</u>	<u>675 Starnes Loop Rd Grant, AL 35747</u>
<u>John R. Kimbrough</u>	<u>135 Olive Dr. Tusculum, AL 35674</u>
<u>Robert McClure</u>	<u>4861 Chisholm Road, Florence, AL 35634</u>
<u>Dennis M. Minter</u>	<u>5505 County Rd. 25 Killen, AL 35645</u>
<u>Donna J. Vandura</u>	<u>463 Hwy 364, Ashomings, MS. 38873</u>
<u>Theresa Danner</u>	<u>70 DREMEYER PL Laigle AL 35646</u>

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Signature

Address

<u>Michael W. Hamble</u>	<u>2259 Co. Rd. 33 Scottsboro AL</u>
<u>William J. Pless</u>	<u>1013 Gent Hill Road Scottsboro, AL</u>
<u>A. F. Hanks</u>	<u>P.O. Box 857 Prichard, AL</u>
<u>Wanda J. McCutchen</u>	<u>P.O. Box 434 Bridgeport, AL</u>
<u>Charles L. Cole</u>	<u>2194 Co Rd 209 Bridgeport, AL</u>
<u>Darryl D. Brown</u>	<u>3041 Cord St Prichard AL 35765</u>
<u>Villan D. Cook</u>	<u>1000 Old 584 Stinson, AL 35772</u>
<u>Jimmy K. Davis</u>	<u>5500 RD 321 Scottsboro, AL 35768</u>
<u>Billy R. Newman</u>	<u>P.O. Box 532 Bridgeport, AL 35740</u>
<u>Robert E. Lowe</u>	<u>180 JEWELL LN W. TWEED TX 77397</u>
<u>Randy L. Johnson</u>	<u>P.O. Box 316 Valley Head, AL 35789</u>
<u>David H. Shamp</u>	<u>P.O. Box 1005 Bridgeport, AL 35740</u>
<u>Mark Cook</u>	<u>1334 Main St In Chalk, TN 37421</u>
<u>John Harris</u>	<u>P.O. Box 431 Stinson AL 35772</u>
<u>Drew, H. Hild</u>	<u>111 Sharn Dr. Stinson, AL 35772</u>
<u>Major C. Thomas</u>	<u>Box 377, Ardella Section, AL 35771</u>
<u>AM Willey</u>	<u>298 Co Rd 275 Bridgeport AL 35740</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

### Commentor No. 147: Petition (Cont'd)

#### AN ASSESSMENT OF THE DRAFT CLWR EIS FOR TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

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I(cont'd)

Signature	Address
<i>James H. [Signature]</i>	730 GERMISTOWN CIR. APT G13 EAST RIDGE, TN 37412
<i>Jim [Signature]</i>	8908 CHIMNEY POINT KNOXVILLE TN 37922
<i>Mark [Signature]</i>	1622 Brundi Ln Hixson TN 37343
<i>Frank [Signature]</i>	141 WENDRICKS BLVD APT 2 CHATTANOOGA TN 37405
<i>Mark [Signature]</i>	189 WATER OAK DR. MADISON, ALA. 35758
<i>Donell [Signature]</i>	6512 TOWNSEND DR. Hixson, TN 37343
<i>James [Signature]</i>	6601 DANGY DR CHATTANOOGA TN 37421
<i>Wm. J. Kagay</i>	7704 Ridge Bay Dr., Hixson TN 37343
<i>Bill [Signature]</i>	6605 HAWKST RUN DR., Hixson, TN 37341
<i>Wayne [Signature]</i>	37859 Hwy 95 N, GREENBACK, TN 37742
<i>David [Signature]</i>	1275 LEASIDE LN, Hixson, TN 37343
<i>Conrad [Signature]</i>	318 Canyon At Lake County, IN 31373
<i>Shirley [Signature]</i>	10005 Hixson Pk., Soddy-Daisy, TN 37379
<i>Paul R. Hein</i>	" "
<i>Timothy M. [Signature]</i>	326 N KNOB CREEK Rd, SEYMOUR TN 37865

### Commentor No. 147: Petition (Cont'd)

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I(cont'd)

Signature	Address
<i>W. [Signature]</i>	16721 E. Glenn Valley, Athens, AL
<i>U. N. SHAH</i>	14014 MAEBETH DR. HSV AL
<i>M. [Signature]</i>	2309 Richmond St, SW, Decatur, AL
<i>Paul [Signature]</i>	69 Aquavista Dr, Kellen, AL
<i>P. [Signature]</i>	131 Stonewall Tr, Marietta AL 35757
<i>Sharon [Signature]</i>	P.O. Box 354, Rogersville, AL 35652
<i>D. L. [Signature]</i>	15283 Hobbs Rd, Athens, AL 35614
<i>B. W. [Signature]</i>	9509 Snake Rd., Athens, AL 35611
<i>Louis [Signature]</i>	2308 Quinn Dr, SE Decatur, AL 35601
<i>David [Signature]</i>	20720 Easty Ferry Rd, Elberton, AL 35602
<i>[Signature]</i>	2242 WESTMEDE DR., DECATUR, AL 35603
<i>[Signature]</i>	25079 Hunt [Signature] Rd, [Signature] AL 35642
<i>David [Signature]</i>	22218 Chickasaw Dr, Athens, AL 35613
<i>[Signature]</i>	1403 HENRY DR., ATHENS, AL 35611
<i>[Signature]</i>	3312 Cedarhurst Dr SW Decatur AL 35603
<i>Charles [Signature]</i>	701 Henry Drive, Athens, AL 35611
<i>[Signature]</i>	12271 Lukers way, Athens, AL 35611

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Commentor No. 147: Petition (Cont'd)

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I(cont'd)

Signature	Address
<u>Joseph R. St</u>	<u>903 Jessie Dr SW Decatur, AL 35603</u>
<u>Joseph H. Hume</u>	<u>113 Daniel St SW Decatur, AL 35601</u>
<u>Jeffrey E. Marshall</u>	<u>1787 Hwy 207 Rogersville AL 35652</u>
<u>John A. Butler</u>	<u>4041 County Rd 26 Rogersville, AL 35652</u>
<u>David O. Polam</u>	<u>311 Central Highway Decatur, AL 35603</u>
<u>Marie C. King</u>	<u>208 Roosevelt Av Muscle Shoals AL 35661</u>
<u>Bridgett B. Hodges</u>	<u>6220 North Pike Cherokee, AL 35616</u>
<u>Ronnie L. Church</u>	<u>106 Lagrange Muscle Shoals AL 35661</u>
<u>David Davis</u>	<u>2525 S. Aspen Springfield MO 65807</u>
<u>Larry W. Shultz</u>	<u>1708 Granddaddy Rd Lawrenceburg TN 38464</u>
<u>Deanne D. Dodd</u>	<u>116 Royal Oak Rd. Florence, AL 35633</u>
<u>William L. Taylor</u>	<u>692 Co. Rd. 1474 Cullman AL 35058</u>
<u>Louis E. Hargis</u>	<u>Rt #1 Box 381 Killen AL 35645</u>
<u>Stanley R. Wallace</u>	<u>470 Ray Richardson Drive Greenville, AL 35615</u>
<u>John F. Carl</u>	<u>61 Kimberly St. SE Decatur, AL 35623</u>
<u>Roger D. Smith</u>	<u>330 Walnut Creek LK Killen AL 35645</u>

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Commentor No. 147: Petition (Cont'd)

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
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I(cont'd)

Signature	Address
<u>Randall L. Hargis</u>	<u>1910 Cumberland Av. SW, Decatur, AL 35603</u>
<u>John R. Red</u>	<u>2223 Victoria Dr Decatur, AL 35603</u>
<u>Douglas E. Hargis</u>	<u>1544 Calfornia Springs Rd. LaFayette, GA 31728</u>
<u>Steve D. Hargis</u>	<u>63 Clarence St. Springfield, MA 01104</u>
<u>David J. Hargis</u>	<u>Kristavigen 71B 72352 Vasterås Sweden</u>
<u>John T. Hargis</u>	<u>17 Brandon Dr. B. Co. AL 35603</u>
<u>John T. Hargis</u>	<u>1408 Cambridge St. D. AL 35603</u>
<u>John T. Hargis</u>	<u>118 Jay Drive Madison AL 35758</u>
<u>John T. Hargis</u>	<u>103 Elmwood Dr. AL 35603</u>
<u>Lib. Polam</u>	<u>604 N Valley Dr. Phenix City AL 37415</u>
<u>John T. Hargis</u>	<u>1215 Perkins Wood Rd Hartselle AL 35640</u>
<u>John T. Hargis</u>	<u>631 Calia Drive, Hartselle, AL 35640</u>
<u>John T. Hargis</u>	<u>2213 Inverness Ln. Decatur, AL 35603</u>
<u>John T. Hargis</u>	<u>106 Autumn Oak Ln Hartselle AL 35749</u>
<u>John T. Hargis</u>	<u>207 Woodstock Lane Florence, AL 35630</u>

**Commentor No. 147: Petition (Cont'd)**

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
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I(cont'd)

Signature

Address

<i>Steven A. Lucha</i>	2222 ESSEX DR. SW. DECATUR, AL 35603
<i>Jerry W. Benson</i>	2305 CHADWICK AVE SW, DECATUR, AL 35603
<i>Harold Webb</i>	130 BILLY LEE RD OPR, AL 35763
<i>James Kyle Graham</i>	320 Poplar Springs Dr. Killen, AL 35645
<i>Pellet E. Clark</i>	101 E. Meadow Hill Dr. Florence, AL 35633
<i>Nick Foss</i>	102 SHADY W. ATHENS, AL 35613
<i>Dychea Walton</i>	212B Mackey St. Rogersville, AL 35652
<i>Timothy Tate</i>	9754 Banker Rd Athens AL 35614
<i>Michael A. Perrett</i>	2503 CHESLEY AVE SW DECATUR AL 35603
<i>Tim White</i>	613 Courtland Ave Muscle Shoals AL 35661
<i>Thomas M. Bunting</i>	400 Maden St Muscle Shoals, AL 35616
<i>Eric J. Orvola</i>	530 Poplar Springs Dr, Rogersville, AL 35652
<i>Leonard R. Madison, Jr.</i>	138 Hawthornwood Dr., Madison, AL 35758
<i>James Rogers</i>	P.O. Box 684 Athens, AL 35612
<i>A. K. HD</i>	905 Garrett Dr Athens, AL 35611
<i>Spence G. Willard</i>	1802 Canton Cir SW, Decatur, AL 35603-3140
<i>Jane A. Harrison</i>	222 P. OAK DR, MADISON AL 35758

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Signature

Address

<i>Robert J. ...</i>	22221 N. ... AL 35613
<i>...</i>	1021 Horizon Lane Huntsville AL
<i>Shirley W. ...</i>	2217 CRICKMAN DR., ATHENS, AL 35613
<i>Donald A. ...</i>	400 Meadowbrook Dr. Huntsville AL 35803
<i>James ...</i>	P.O. Box 684 Athens, AL 35612
<i>Edward S. ...</i>	PO BOX 195 RT 6 Decatur AL 35603
<i>...</i>	103 Maple Dr. Florence AL 35633
<i>...</i>	2716 Birchwood Dr. Decatur AL 35603
<i>Bobby P. ...</i>	2003 New Center Rd. Saraland AL 36676
<i>Bruce ...</i>	2901 Huntwood Dr. Decatur AL 35601
<i>Leah ...</i>	3011 Ardura Dr. Madison AL 35757
<i>Sam ...</i>	1417 GRANT ST. SE. DECATUR, AL 35601
<i>...</i>	P.O. Box 1057 KILLEN AL 35645
<i>...</i>	1286 Hanna Loop. E. Decatur AL 35620
<i>...</i>	16633 ZEHNER RD ATHENS AL 35611
<i>Robert Meeks</i>	13485 Decatur Rd Athens AL 35611
<i>...</i>	20 DARIK PK. DR. Decatur AL 35603

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I(cont'd)

Signature

Address

<u>[Signature]</u>	<u>STC-1E SQN</u>
<u>[Signature]</u>	<u>PSC 1F-M MS</u>
<u>May E. McHugh</u>	<u>PSC 1F-M</u>

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I(cont'd)

Signature

Address

<u>[Signature]</u>	<u>40AR 1A-TKS</u>
<u>[Signature]</u>	<u>WAR 1A-MS</u>
<u>[Signature]</u>	<u>2106 Bay Pointe Dr, Hixson TN 37133</u>

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**AN ASSESSMENT OF THE DRAFT CLWR EIS  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

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**AN ASSESSMENT OF THE DRAFT CLWR EIS  
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1(cont'd)

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**AN ASSESSMENT OF THE DRAFT CLWR EIS  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

*1(cont'd)*

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# AN ASSESSMENT OF THE DRAFT CLWR EIS FOR TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

1(cont'd)

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Signature

Address

*Stephen L. Keever*

*MR 2T-C*

*I(cont'd)*

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Signature

Address

*Joseph D. Norder*  
*Brenda Gally*

*40AR 1A-MKS*  
*WAR 1A-MS*

*I(cont'd)*

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*I(cont'd)*

Signature

Address

*Haife**637 Battery Pl #7**Chatt. TN 37403*

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*I(cont'd)*

Signature

Address

*J.L. Bruchman**ADM 1L - WBN**Richard J. Hight**8801 Valley Circle, Dayton, TN 37329**Richard J. Hight**155 Betsy Street, Dayton TN 37321**J.F. Hight**ADM 1L - WBN**J.F. Hight**ADM 1L - WBN**W. D. Hight**11135 Crook Point Drive, Knoxville, TN 37922**S. D. Hight**ADM 1L - WBN**W. D. Hight**ADM 1L - WBN**Paul Hight**ADM 1L - WBN*

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Signature

Address

<del>John A. Brown</del>	8236 Blue Spruce Dr. Hixson, TN 37343
<del>Larry M. Byler</del>	813 FOX CHASE LN. HIXSON TN 37343
<del>Patricia L. Evans</del>	8236 Blue Spruce Drive Hixson, TN 37343
<del>Navin S. Mah</del>	1295 LEASIDE LAKE HIXSON, TN 37343
<del>Richard W. Hittinger</del>	1711 Rock Bloss Rd Hixson TN 37343
<del>Jeffery S. Brown</del>	115 E. Woodshire Dr. Knoxville, TN 37922-5651
<del>Donald J. Hixson</del>	6424 LAKE SHADOWS CR. HIXSON, TENN. 37343
<del>John E. Smith</del>	5208 COLD SPRINGS RD HIXSON TN 37343
<del>Reynold Bell</del>	1948 Light Tower Cr. Hixson, TN 37343
<del>Stanley R. Plummer</del>	2630 Pec Rd, Saddle Creek, TN 37374
<del>James M. Work</del>	2709 Autumn Chase Dr, Chattanooga TN 37421
<del>Myra S. Butler</del>	9676 LOVELESS RD SADDLE CREEK, TN 37374

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Signature \_\_\_\_\_

Address

Strad PEN-NIC-SPN

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**Commentor No. 147: Petition (Cont'd)**

## TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

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1(cont'd)

Signature

Address

Belton P Walker	#1 3617 N. Crestview Dr.	Huntsville, AL 35816
Johnny Whisenant	922 Rocky Branch Dr.	Guntersville, AL 35976
Joseph C. Whitely, Jr.	1204 Brandywine Ln. SE	Decatur, AL 35601
Mike Jones	601 Dogwood ON	Decatur AL 35603
Walter L. Millett	3536 McCaus Rd	Levinur, AL 35603

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## AN ASSESSMENT OF THE DRAFT CLWR EIS FOR

6

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
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1(cont'd)

Signature

Address

Ally Carter	319 Harris Dr. Florence AL 35634
Raymond Wright	3203 Trails End Decatur AL 35603
M. Sherr M. M. M.	2118 Sky Park Rd Florence AL 35634
Douglas P. Dyer	610 MARTHA ST SW DECATUR AL 35601
Don B. Lys	8304 Island Point Dr. Harrison TN 37341
Darold L. Welch	9425 Shadow Pt Cir Chattanooga, TN 37421
Ed. H. H.	3006 Haverhill Rd. Decatur AL 35601
Donald R. Rickett	12221 East Yorkshire Dr. Athens, AL 35613
W. H. H.	4502 Autumn Lane Tr Decatur AL 35603

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I(cont'd)

Signature	Address
<u>James D. Anderson</u>	<u>2216 Lynn Rd., HUNTSVILLE AL 35810</u>
<u>Phil Edwards</u>	<u>26859 Ross Dr Athens, AL 35613</u>
<u>Clyde Williams</u>	<u>P.O. Box 124 Belle Mina, AL 35615</u>
<u>Wilfred E. Little</u>	<u>23 Orchard Hill Rd Fayetteville, TN 37334</u>
<u>John K. Allen</u>	<u>255 County Road 470 Lexington AL 35648</u>
<u>Robert R. Martin</u>	<u>3315 Co. Rd 98 ANDERSON AL 35630</u>
<u>Ernest W. May</u>	<u>464 Co Rd 168 Killen AL 35645</u>
<u>JR M</u>	<u>631 Oak View Circle Killen, AL 35645</u>

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I(cont'd)

Signature	Address
<u>Ricky Owens</u>	<u>574 Wheeler Rogersville AL</u>
<u>Lucy Rogers</u>	<u>1763 Co Rd 257 Town Creek AL</u>
<u>Emmett King Jr</u>	<u>3011 West Ave Muscle Shoals AL</u>
<u>Jimmie Brainer</u>	<u>144 Co. Rd 1227 Union Mt AL</u>
<u>Donald Givens</u>	<u>215 P.O. Box 173 Rogersville AL</u>
<u>Don R. Riden</u>	<u>2956 Rt 1 Hwy 127 Eikmant AL</u>
<u>Marion Bell</u>	<u>101 School Cut off Rd. Jacksonville Ala.</u>
<u>Al P. Lyle</u>	<u>7408 Ogilvie Rd. Scottsboro, AL</u>
<u>James Bombardier</u>	<u>8330 Co. Rd. 214 TRINITY, AL</u>
<u>Willie</u>	<u>713 SLACK ST GADSDEN AL</u>
<u>James W. Reese</u>	<u>17611 Nuclear plant Road ATHEN AL</u>
<u>Don Ed</u>	<u>239 Rose Rogersville, AL 35652</u>
<u>Robert McOfer</u>	<u>1927 Piggah Ridge Rd Pulaski, TN 38478</u>
<u>Wright Hickey</u>	<u>1340 C. Leakey Road Leighton AL 35646</u>
<u>Thomas M. Hannon</u>	<u>1223 Co. Rd. 124 Town Creek AL 35624</u>
<u>Vickey Kelly</u>	<u>538 Co. Rd. 175 Florence, AL 35634</u>
<u>William T. Weldon</u>	<u>2145 Co. Rd. 38 Hanceville Ala 35077</u>
<u>Jennell Bannett</u>	<u>109 S.H. Hwy 119, Guley, AL 35748</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

Commentor No. 147: Petition (Cont'd)**TVA TODAY UPDATE**

Friday, September 18, 1998

**Language Dropped That Blocked TVA Tritium Production**

A House-Senate conference committee in Congress has agreed to drop language that would have blocked a plan to produce tritium at Bellefonte Nuclear Plant.

The Department of Energy has been directed to provide tritium to the Department of Defense by 2005. DOE is considering the production of tritium either at Bellefonte or at a proposed linear accelerator at DOE's Savannah River site in South Carolina.

The House of Representatives had included language in its version of this year's defense-authorization bill that would have prohibited using a commercial reactor such as Bellefonte's for tritium production.

Chairman Crowell issued the following statement today:

On behalf of the TVA Board, I deeply appreciate the hard work of members of the Valley congressional delegation to keep TVA's Bellefonte Nuclear Plant as an option to produce tritium. This roadblock has been cleared because of their hard work and leadership. Bellefonte remains in the competition, and it could not have been done without them.

Bellefonte is truly the best option because it:

- Saves taxpayers at least \$4 billion when compared to the accelerator option, according to the Congressional Budget Office.
- Maximizes TVA's \$4-billion investment in the plant.
- Creates 700 permanent jobs and hundreds more indirect jobs. That's not including the additional construction jobs at the plant.
- Uses a proven technology that is safe and environmentally friendly.
- Meets DOD requirements for national defense.

Completing Bellefonte is consistent with TVA's policy of only finishing a nuclear plant if we have a partner. Today, because of the help of the Tennessee Valley Delegation, we are one step closer to making that happen.

Tritium is an isotope of hydrogen that is required by all U.S. nuclear weapons. Because it decays at a rate of about 5 percent per year, it must be replaced periodically. The United States has not produced tritium since 1988, when the last tritium-production reactor was shut down at the Savannah River site.

*TVA Today* is a daily source of information for TVA employees. Please send items or ideas to Dan Adair in Employee Communications by e-mail (Microsoft Exchange), fax (423-632-7902) or interoffice mail (ET 6E-K), or call him at 423-632-8054.

Commentor No. 147: Petition (Cont'd)

**AN ASSESSMENT OF THE DRAFT CLWR EIS  
FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT**

We, the undersigned, have reviewed the draft Environmental Impact Statement (EIS) for the production of tritium in a Commercial Light Water Reactor (CLWR) dated August 1998. We find the proposed tritium production program to be environmentally safe and to produce no measurable health effects. In addition, we conclude that Bellefonte Nuclear Plant should be named in the EIS as the preferred alternative based on its least life cycle cost to the U. S. taxpayer and the positive socioeconomic effects of the project. A summary of the primary points from the draft EIS used to reach this conclusion are shown on the attached pages.

Signature

Address

<i>Raymond L. Gustin</i>	600 Tottenham Rd. Killen AL 35645
<i>Rich McChesney</i>	204 Phillips Drive, Killen AL 35645
<i>John D. Lyndon</i>	321 Nottingham Rd, Florence, AL 35633
<i>Robert L. Conley</i>	409 CONGRESS DR, ATHENS, AL 35611
<i>John H. King</i>	15066 FIELDING RD, ATHENS, AL 35611
<i>James T. Delany</i>	17259 Gloze Rd. Athens AL 35611
<i>Tommy Parrish</i>	10910 New Cut Rd. Athens AL 35611
<i>James E. Howell</i>	14226 Section Line Rd, Florence AL 35630
<i>Mike A. Swann</i>	275 WOODCASTLE DR. FLORENCE AL 35630
<i>Jim H. Hyatt</i>	1121 McCullough Dr Huntsville, AL 35801
<i>John A. Gustin</i>	1911 Gentry Rd 28, Florence, AL 35634
<i>John W. H. King</i>	2259 Mountain Dr. Athens AL 35613
<i>John A. Gustin</i>	701 Sylvan Drive Rockwood, TN 37854

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

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Commentor No. 147: Petition (Cont'd)

FOR  
TRITIUM PRODUCTION AT BELLEFONTE NUCLEAR PLANT

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Signature

Address

<u>Dennis L. Harnema</u>	<u>86 Rutherford Lane, Ringgold, GA 30728</u>
<u>W. H. H. Harnema</u>	<u>5411 Samsel Rd, Signal Mountain, TN 37377</u>
<u>Charles L. Harnema</u>	<u>1001 W. 10th St., Chickamauga, GA</u>
<u>David J. Hark</u>	<u>694 Charbell St., Hixson, TN 37343</u>
<u>Frank E. Hark</u>	<u>6221 Shallowford Road #21, Chattanooga, TN 37421</u>
<u>Wanda W. Harkwell</u>	<u>1906 Oak Cove Dr., Seddy Daisy, TN 37379</u>
<u>Walter E. Harkwell</u>	<u>8810 Havendale Lane, Chattanooga, TN 37421</u>
<u>W. David Harkwell, Jr.</u>	<u>6804 W. 10th St., Chickamauga, TN 37343</u>
<u>Frank E. Harkwell</u>	<u>1803 Pine Needles Tr., Chattanooga, TN 37421</u>
<u>Wanda W. Harkwell</u>	<u>6510 Hunt Drive, Chattanooga, TN 37421</u>
<u>S. Michael Harkwell</u>	<u>4528 Kings Lake Ct., Chattanooga, TN 37416</u>
<u>Charles N. Harkwell</u>	<u>128 Harkwell Lane, Ringgold, GA 30736</u>
<u>Richard L. Harkwell</u>	<u>5434 Poplar Springs Rd., Ringgold, GA 30736</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

I(cont'd)

Commentor No. 147: Petition (Cont'd)

Louvain, from  
Watts Bar Group 501  
Amington  
10/6/98

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FOR  
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Signature

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<u>James D. Amington</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 1F-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 1F-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
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<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 1M-WBN</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N</u>
<u>W. H. H. Harkwell</u>	<u>EQB 2N-WBN</u>

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

**Commentor No. 147: Petition (Cont'd)**

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I(cont'd)

Signature	Address
C.M. Ken	EQB-IF WBN
William J. J.	EQB-IF WBN
Nicholas C. Horning	EQB-IF-WBN
S. Paul Harlan	EQB-IF WATTS BAR NUCLEAR
T.L. Vidner	EQB-IF WBN
Mayrice L. Young	EQB-2N WBN
Jim F. Coon	EQB-IF WBN
Arnold Huth	EQB-IF WBN
Frank J. Huth	EQB-IF WBN
Jim P. Edmondson	EQB-IF WBN
Gary J. Huth	EQB-IF WBN
Cedric L. Huth	EQB-IF WBN
Jack J. Huth	EQB-IF WBN
John K. Huth	EQB-IF WBN
Paul B. Huth	EQB-IF WBN
Sharon A. Huth	EQB-2N WBN

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

**Commentor No. 147: Petition (Cont'd)**

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I(cont'd)

Signature	Address
Robert J. Collette	EQB 2N-WBN
Jim W. Lysen	EQB 2N-WBN
Patricia E. Donahue	EQB 2N-WBN
James R. Huth	EQB 2N-WBN
Robert J. Huth	EQB 2N-WBN
Sheldon Wase	EQB 2N-WBN

Return Petition to Louvain Edmondson, OPS 2B - SQN, by October 6, 1998

**Public Hearing – North Augusta, South Carolina  
October 1, 1998**

**Commentor 500 (Bob Smith)**

- 1/09.08 The commentor asks whether the schedule for completing construction of the Bellefonte Nuclear Plant Unit 1 (1999 to 2004) is hypothetical or real.
- 2/03.02 The commentor believes there is a logical disconnect between the Bellefonte 1 completion schedule (1999 to 2004) and the Presidential requirement to establish a tritium supply source by 2005. The commentor asserts that, if a one-year delay in the schedule occurs as a result of planned additional technology assessments or budget constraints, the Bellefonte Nuclear Plant would not be capable of meeting the Presidential requirement for two years because the irradiated tritium targets would not arrive at the Savannah River Site until 2007.
- 3/24.05 The commentor asks how a one-year delay in completing construction at Bellefonte 1 would impact the schedule to complete the Tritium Extraction Facility by 2005.

**Commentor 501 (Lee Poe)**

- 1/04.01 *[In response to a DOE statement that using a commercial light water reactor (CLWR) for tritium production is “technically straightforward and safe”]* The commentor asks if DOE takes the same position on the Accelerator Production of Tritium (APT) option.
- 2/05.04 The commentor asks if DOE would spend all of the money necessary both to design the APT and to complete reactor construction if either were designated as a backup source for tritium production. The commentor states that the information on the primary and backup tritium sources is difficult to understand—particularly the elements DOE requires for a facility and a backup and what that really means to public citizens.
- 3/23.14 The commentor asks to know the total costs to complete commercial reactor construction for use both as a primary and a secondary (backup) production source, including the Tritium Extraction Facility.
- 4/04.03 The commentor requests charts summarizing and comparing the environmental effects of CLWR tritium production with those of the APT and the Tritium Extraction Facility.
- 5/05.02 The commentor believes the CLWR Draft Environmental Impact Statement (EIS) summarizes the environmental effects of the proposed action, gives a very high level summary of the No Action Alternative, and “fixes it” so citizens will have a “very tough time” trying to understand what is being proposed. The commentor states that it is very difficult to understand the decisions that DOE is talking about, particularly when the EIS does not provide the reader with the no-action effects and merely tiers them off to some other document.
- 6/05.29 The commentor is concerned that the CLWR Draft EIS states that a CLWR Final EIS will be issued in December 1998, but the speaker mentioned January as a target date. The commentor postulates that, as a Secretarial decision is expected at about the same time that the CLWR Final EIS is issued, a decision already must have been reached. The commentor suggests that either DOE should not spend the money to write the CLWR Final, APT, and Tritium Extraction Facility EISs because their completion will not affect the decision, or DOE should work to make

the Final EISs worthwhile. The commentor would like to see the CLWR, APT, and Tritium Extraction Facility EISs combined into one document.

- 7/06.03 The commentor postulates that: (1) having received only two responses to their request for proposals, DOE made the decision to build tritium-producing burnable absorber rods (TPBARs) for use in pressurized water reactors only, not boiling water reactors, which “cuts the territory down,” and (2) this justified listing the five Tennessee Valley Authority (TVA) reactors in DOE’s approach and excluding all others from the EIS analysis. The commentor asks why DOE analyzed all the pressurized water reactors not covered by the DOE/TVA proposal.
- 8/24.01 The commentor questions whether use of the TVA system is reasonable if DOE and TVA can’t communicate with each other effectively. The commentor suggests an interagency discussion would help fulfill DOE’s need to produce tritium.
- 9/03.03 The commentor states that the numbers of TPBARs cited by the CLWR Draft EIS clearly suggest DOE will use two or more reactors for tritium production.
- 10/19.04 The commentor states that, according to the numbers given in the CLWR Draft EIS, the TPBARs will release tritium at a rate of less than 22,780 Curies per year, not the 1,890 Curies per year cited.
- 11/19.05 The commentor questions why DOE would want to run the Tritium Extraction Facility furnaces within the top 90 percentile of their maximum temperature. The commentor states that there is no data in the EIS that addresses recovery efficiency in the Tritium Extraction Facility.
- 12/23.15 The commentor questions the fairness of giving the Bellefonte plant a significant credit for the sale of electric power, but not giving similar credits to the APT and the other reactors for revenue returns. The commentor points out that if it takes more than one reactor, the cost of using Bellefonte together with one or more CLWRs should be combined, and the costs and revenue returns of the CLWR option should be compared with those of the APT option.
- 13/23.16 The commentor proposes a cost document be appended to the CLWR Final EIS. The commentor states that a comparison of the costs for all the options should be available somewhere, if not in the Final EIS.
- 14/01.04 The commentor suggests appending the Interagency Review to the CLWR Final EIS. The commentor agrees that CLWR tritium production is not illegal because tritium is not a special nuclear material. The commentor believes the United States should abide by both the legal and technical implications of its actions and not try to set examples that will be misinterpreted by outside nations.
- 15/01.09 The commentor believes that weapons production and power generation should not be combined because it would set a precedent that would negatively affect U.S. nonproliferation objectives.
- 16/01.10 The commentor believes that CLWR tritium production is not illegal, but is morally wrong.

**Commentor 502 (Dick Reynolds)**

- 1/06.03      The commentor asks if TVA has withdrawn the irradiation services part of their bid. The commentor asks whether TVA will reconstitute their offer to provide irradiation services for DOE tritium production.
- 2/03.02      The commentor asks for confirmation that DOE would use the Watts Bar Nuclear Plant if there were any delays in completing Bellefonte for tritium production.

**Commentor 503 (Gary Stooksbury)**

- 1/01.04      The commentor believes the actions proposed in the CLWR Draft EIS will undermine the twin [U.S.] objectives of establishing a supply of tritium for national defense purposes and preventing the spread of nuclear weapons technologies and materials throughout the world. The commentor believes the Interagency Review that examined the impact of CLWR tritium production on U.S. nonproliferation objectives was flawed in its logic, vague in its conclusions, and erroneously implied that previous conversion of U.S. weapons facilities to civilian applications should make it easy to do the reverse. The commentor believes a worldwide outcry will result if the United States backs away from its strong nonproliferation stance and, in the end, the CLWR tritium production option will be abandoned after damaging the United States' international image and causing adverse impacts on the nuclear stockpile.
- 2/21.06      The commentor believes there are significant uncertainties that will affect TVA's ability to license a commercial light water reactor for tritium production, including public concern over new safety and environmental hazard and public discomfort with the proposal to commingle military and civilian reactor purposes. The commentor believes there is no insurance that the U.S. Nuclear Regulatory Commission (NRC) will issue a license or a license amendment for this endeavor and, if not, this would cause the CLWR option to be abandoned and would result in adverse impacts on the nuclear stockpile.
- 3/23.02      The commentor believes DOE has significantly underestimated the costs associated with the CLWR option and that these estimates should be subjected to an independent third-party review.
- 4/23.17      The commentor states that the CLWR Draft EIS discussed the use of TVA's Watts Bar and Sequoyah nuclear facilities, yet it is widely reported that TVA has withdrawn those facilities. The commentor states that DOE cites the TVA estimate of \$2.4 billion to complete Bellefonte 1 and questions TVA's ability to bring anything on line, on time, and under budget. The commentor states that another nuclear facility has estimated that over \$4 billion would be required to complete Bellefonte and that the Government Accounting Office says that TVA's estimates are very unreliable—past overruns of several hundred percent were experienced at plants that TVA assessed to be 80 percent complete.
- 5/09.09      The commentor states that, as someone who grew up in the shadows of Watts Bar and remembers reading the newspaper articles and what it took to bring that facility on line, he is appalled that DOE would even discuss Watts Bar.
- 6/23.20      The commentor believes that capital costs for the Bellefonte reactors will be significantly more than for the APT and that life cycle costs will be comparable.
- 7/04.01      The commentor believes there are no programmatic advantages related to the CLWR option and that, instead, it has serious, if not fatal, deficiencies.

- 8/05.07      The commentor believes the CLWR EIS must include analyses of the potential worldwide environmental impacts resulting from a higher probability that some nation will initiate or continue nuclear weapons research testing and production programs as a result of U.S. CLWR tritium production.
- 9/15.07      The commentor requests the CLWR EIS human health effects analyses to fully explain the basis for assuming that 10 percent of the tritium released from the melted targets will be in an oxidized form within the contaminated atmospheres. The commentor believes tritium may be available in the contaminated atmosphere and may be released to the environment. The commentor requests that the EIS analyses quantify the estimated release and the environmental effect; address the disposition of tritium remaining in the reactor facility; and address the environmental impacts associated with disposition of all tritium released in a design-basis accident.
- 10/05.05      The commentor believes the CLWR Draft EIS does not evaluate the environmental impacts of all the program options under consideration.
- 11/03.03      The commentor asks for information concerning how many reactors DOE/TVA plans to use for tritium production. The commentor also asks for information about the specific TPBAR design and fuel site that DOE says would allow one reactor to make three kilograms of tritium per year, and how they are different from those described in the CLWR Draft EIS. The commentor believes that if a one-reactor option is being considered, then the EIS should be corrected to describe and analyze the appropriate TPBAR design and fuel site. If two or more reactors are needed, then DOE's program and budget planning needs to reflect that fact.
- 12/23.18      The commentor states that the Congressional Research Service review raises a serious question about the ability of Bellefonte to generate sufficient revenue to offset operating costs, much less amortize construction.

**Commentor 504 (Peter Gray)**

- 1/01.09      The commentor believes it is U.S. policy to maintain the separation of civil and military facilities, and the United States should set an example for the world by not making weapons in civilian facilities. The commentor believes the examples of using a facility for both military and civilian purposes that are described in the CLWR Draft EIS are not comparable to the proposed action because the facilities were first used for military purposes and later converted to civilian use.
- 2/21.05      The commentor believes the NRC is likely to delay DOE defense programs assigned to a CLWR.
- 3/04.02      The commentor states that, if cost is the real discriminator, DOE owns another, less expensive, tritium production concept that would cost about \$600 million—less than a third of the cost of CLWR tritium production and about a quarter of the cost of building an accelerator. The commentor calls for a review of this device. The commentor believes that, failing the use of the less expensive device, DOE should use the Savannah River Site because of its nearly 45 years of tritium experience and the readiness of its workers to serve the nation again capably, safely, efficiently, cost-effectively, and in an environmentally sound manner.
- 4/03.03      The commentor did not understand that production of 3 kilograms of tritium per year was a surge goal and that the “day-in, day-out” goal was something lower.
- 5/23.16      The commentor states that the surge goal would nearly double the number of fuel assemblies needed and, correspondingly, the amount of spent fuel for disposal. The commentor asks that

these costs be addressed in the CLWR Final EIS so that the public will know what it would cost to produce 3 kilograms of tritium per year.

**Commentor 505 (David Losey)**

1/01.09      The commentor believes the United States has intended for years to separate its commercial and defense interests, and now is the time to move toward more integrity by avoiding legalistic word-splitting (tritium is not a special nuclear material) and maintaining the separation of civilian and military nuclear facilities.

**Commentor 506 (Donald Morris)**

1/06.03      The commentor asks about media reports that TVA has withdrawn their offer for irradiation services.

2/05.27      The commentor asks whether DOE is considering purchasing a TVA reactor or the irradiation services of a reactor.

3/23.19      The commentor asks about reports that TVA has offered to complete construction of the Bellefonte reactor for irradiation of the TPBARs, and that TVA's Chairman has stated that TVA will require all the funding "up front" before undertaking completion and licensing of the Bellefonte reactor. The commentor asks what guarantees DOE will require of TVA to ensure that construction and NRC licensing of the Bellefonte plant will be completed within the stipulated costs.

4/ 23.21      The commentor asks whether the fixed price for completing the Bellefonte plant would also include defense of the project against any nuclear activist suits or intervenors.

**Commentor 507 (Bob Schwartz)**

1/02.01      The commentor questions the need for tritium production. The commentor believes DOE tritium production is a jobs program, not a vital necessity.

2/08.02      The commentor believes the Savannah River Site has enough problems of its own without assuming new missions.

**Public Hearing - Rainsville, Alabama  
October 6, 1998**

**Commentor 600 (Mike Womacks)**

1/23.02      The commentor is concerned about cost overruns, in view of the Tennessee Valley Authority's (TVA) history, and asks how the public may assume that the \$1.9 billion or \$2.1 billion TVA says it will take [to complete Bellefonte for tritium production] will be sufficient.

2/01.04      The commentor asks if the United States is now willing to allow other countries to produce tritium in their commercial nuclear power plants.

3/14.20      The commentor notices that the health risks and impacts analyzed in the Draft EIS deal with tritium production only, and not the risks and impacts of the plant itself (without tritium



production). The commentor asks to know the health risks and impacts resulting from both tritium and nuclear power production. The commentor is concerned that people already are affected by nuclear power production and an additional 1.1 percent, or about 1,500 people, would die of cancer as a result of the proposed action.

**Commentor 601 (Charles Anderson)**

- 1/14.21      The commentor asks if his chances of winning the Georgia Lottery without buying a ticket are better than his chances of dying from radiation released by a tritium-producing Bellefonte nuclear power plant.

**Commentor 602 (Joseph Imhof)**

- 1/11.11      The commentor cites a quote from the CLWR Draft EIS on page 5-53 [the commentor refers to Appendix C, page 5-53, but the reference is misquoted], the first sentence in the section on Threatened and Endangered Species: “Operational impacts on threatened or endangered species could occur through the release of thermal, chemical, or radioactive discharges to the atmosphere or the river.” The commentor asks why it is necessary to discharge radioactive material into the river and whether there is any alternative.
- 2/11.12      The commentor asks whether the small amounts of radiological and chemical materials normally discharged into a river by a nuclear power plant are processed before being discharged.

**Commentor 603 (Melvin Brewer)**

- 1/24.06      The commentor asks where the tritium produced by a CLWR would go and what would be done with it.
- 2/01.01      The commentor asks why the United States needs nuclear weapons.
- 3/01.10      The commentor asks if nuclear weapons are meant to be genocide weapons and states that, wherever they want to make tritium, he'll be there actively opposing it. The commentor also states that he has heard talk about jobs, but asks when people are going to start talking about humanity.

**Commentor 604 (Roger Graham)**

- 1/02.02      The commentor asks if it is true that, for America to maintain its nuclear weapons capability, the country must be able to produce tritium by the year 2005.
- 2/01.04      The commentor asks whether it is true that, even if the United States doesn't have nuclear weapons, other countries will have them.
- 3/07.01      The commentor is in favor of tritium production in the United States.
- 4/07.03      The commentor thinks that we owe it to the people in the military to provide the best technology to help them protect us. The commentor doesn't care whether tritium is produced in Alabama or South Carolina, but does think our elected officials should be prudent in their decisions to spend taxpayer dollars. The commentor states that the Bellefonte Nuclear Plant could be ready to produce tritium for less than \$3 million, and that it uses a proven safe technology that will produce revenues from the sales of much-needed electricity. The commentor compares this

figure to the cost of building an accelerator—\$16+ billion for an accelerator that may not work and would cost \$155 million a year to operate.

**Commentor 605 (Jerry Ward)**

- 1/23.15 The commentor asks how the projected \$1.9 billion cost to complete the Bellefonte plant for tritium production compares with the total costs to develop and construct the Savannah River option (the APT option at the Savannah River Site).

**Commentor 606 (C. A. Frees)**

- 1/11.09 The commentor asks the distance between the Bellefonte plant's point of discharge into the river and the point where the Jackson County Water Department draws water from the river for public use. The commentor, upon hearing the answer is 4.5 miles, asks if the public water source that was measured is the one for Fort Payne. The commentor also asks the location of the other public water sources in Jackson County and their distance from the Bellefonte plant's discharge point.

**Commentor 607 (Doug Grice for U.S. Congressman Bud Cramer)**

- 1/07.03 The commentor reads a statement from Congressman Cramer in support of completing the Bellefonte plant for tritium production because it is safe and economically sound; area residents have a work ethic; and it would create jobs.

**Commentor 608 (Angie Culvert for U.S. Senator Jeff Sessions)**

- 1/07.03 The commentor, speaking for Senator Sessions, expresses support for the completion of the Bellefonte plant for tritium production because it is right for the taxpayers, the Department of Defense, the nation, and northern Alabama.

**Commentor 609 (Paul Housel for U.S. Congressman Robert Aderholt)**

- 1/07.03 The commentor reads a statement from Congressman Aderholt in support of completing Bellefonte for tritium production because all the facts concerning safety, national defense readiness, and budgetary issues point to the Bellefonte plant as the best option, and it would bring enormous potential benefits to northern Alabama.

**Commentor 610 (John J. Federico, Jr.)**

- 1/07.03 The commentor states that he attended the scoping meetings and spoke in opposition to CLWR tritium production; but after being invited to tour the Bellefonte plant, he now believes the plant can be operated safely.
- 2/05.27 The commentor objects to the December 1995 Record of Decision that allowed DOE to either initiate purchase of an existing commercial reactor or buy reactor radiation services. The commentor is concerned that this decision allows DOE to purchase the Bellefonte plant if it chooses. The commentor fears that the checks and balances that are common to private industry and ensure proper oversight over commercial plants (e.g., external peer, regulatory, and fiscal reviews) would disappear because DOE nuclear defense facilities are not governed or licensed by the NRC, nor are they obligated to adhere to the Institute of Nuclear Power Operations' industrial standards of excellence. The commentor states that if Bellefonte comes on line, it must

never be allowed to become a government-owned, contractor-operated defense facility that will go unchecked by the mechanisms designed to ensure it is managed with the safety of the citizens and the environment as its primary concern. The commentor also states that DOE's environmental record has been horrific in the way it conducted its nuclear business during the Cold War, and that DOE has created numerous Superfund sites that will take years and millions of dollars to clean up. The commentor doesn't think it is smart for taxpayers to spend \$4.5 billion on constructing Bellefonte up to this point and then just let the plant sit there and not produce a return on the investment.

- 3/06.05 The commentor asks if the reference to the 1995 Record of Decision can be deleted from the CLWR Final EIS. The commentor is concerned that if the reference stays in the EIS, then somewhere down the line DOE will have the option to purchase the Bellefonte plant and make it a defense facility. The commentor is concerned that this might occur 40 years from now at the end of the Bellefonte plant's lifetime, when the NRC won't renew the plant's license, but there is still a need for tritium. The commentor believes that DOE could then buy the plant and operate it without TVA. The commentor believes that the language referring to this Record of Decision in the CLWR EIS should be deleted, at least where it pertains to conversion to a defense facility, and the December 1995 Record of Decision should be amended accordingly.
- 4/17.03 The commentor is concerned about spent fuel storage. The commentor states that if the Nuclear Waste Policy Act of 1982 mandates that spent fuel will be managed at a national repository, then DOE should expedite this effort and assist in resolving the siting issues instead of creating additional onsite spent fuel storage facilities. The commentor also states that the last major planning assumption in Section S.3.2.1 on page 17 of the CLWR Draft EIS Summary should be changed to state that spent fuel rods resulting from the tritium project will be stored in an existing spent fuel facility until a national repository becomes operational, in accordance with the 1982 Nuclear Waste Policy Act.
- 5/14.04 The commentor believes that nothing should be done that puts citizens and the [Tennessee] River at risk. The commentor states that one cancer death in 154,000 years is too many.
- 6/07.04 The commentor believes that Bellefonte can safely do its part for DOE, which includes helping to keep the nation's nuclear stockpile credible while producing electricity.

**Commentor 611 (State Senator Lowell Barron)**

- 1/07.03 The commentor reports that 77 percent of respondents answering a political poll in Jackson County supported completion of the Bellefonte plant for tritium production. The commentor believes that regional public support for tritium production at the Bellefonte plant is based on the view that it would provide jobs and keep the nation's military strong. The commentor supports tritium production at the Bellefonte plant because it is safe and it is in the best interest of the nation and the local area.

**Commentor 612 (David Thornell)**

- 1/07.03 The commentor has several statements in support of completing the Bellefonte plant for tritium production from various area officials and organizations, including Mayor Louis Price of Scottsboro, Alabama; Mayor Glenda Hodges of Woodville, Alabama; Mayor Elizabeth Hayes of Hollywood, Alabama; the North Alabama Mayor's Association; and the Chamber of Commerce and its affiliated organizations. The commentor and his employer enthusiastically

support completing the Bellefonte plant for tritium production because it is both a win/win situation for Jackson County and the nation, and the wisest and best choice.

**Commentor 613 (Dutton Mayor Philip Anderson)**

1/07.03      The commentor believes that tritium production at the Bellefonte plant would be a very big plus for all of Jackson County and the surrounding area. The commentor asks DOE to give serious consideration to using the Bellefonte plant for tritium production.

**Commentor 614 (Leroy Beasley)**

1/07.03      The commentor, speaking on behalf of his professional association, supports tritium production at the Bellefonte plant because it is a positive step for TVA, for the region, and for DOE, and it can provide area residents with things they really need, such as additional electrical capacity. The commentor presents a petition signed by members of major labor unions at the TVA plants stating that they have reviewed the CLWR Draft EIS, and they endorse and support the development of the Bellefonte project. The commentor compares the \$1.9 billion cost to complete the Bellefonte plant for tritium production to the cost of the accelerator option, which is conservatively estimated to be more than \$9 billion.

**Commentor 615 (Langston Mayor Butch Vaught)**

1/07.03      The commentor, speaking on behalf of the residents of Gurley and Langston, supports completion of the Bellefonte plant for tritium production because it would provide an assured supply of tritium at the least cost to U.S. taxpayers, as well as much needed employment to an economically depressed area of the United States.

**Commentor 616 (Joe Buttram)**

1/07.03      The commentor, speaking for the county commission, supports the completion of Bellefonte as a nuclear power plant and for tritium production and believes the Bellefonte plant can be operated safely. The commentor thinks the people in Jackson County are generally in support of tritium production at the Bellefonte plant. The commentor states that there is nothing inherently dangerous about a United States-produced nuclear weapon. The commentor believes those in control of nuclear weapons in other countries are the problem because they do a poor job of producing them. The commentor states that if Bellefonte is completed, it will be the best and safest-designed nuclear plant ever built. The commentor thinks the dangers of operating the Bellefonte plant for tritium production would be minuscule, and that it would be good for Jackson County, the State of Alabama, and surrounding areas in Tennessee and Georgia. The commentor states that the risks area residents would be taking if Bellefonte were used for tritium production would be nothing compared to the risks other folks have taken for the nation's safety and freedom from other powers.

**Commentor 617 (Ronnie Boles)**

1/07.03      The commentor, speaking on behalf of his utility board, supports completion of the Bellefonte Nuclear Plant for tritium production. The commentor states that he and his fellow board members are comfortable with both TVA's ability to safely construct and operate this facility and DOE's ability to safely transport tritium out of the area.

**Commentor 618 (Richard Ward)**

1/07.03      The commentor, speaking on behalf of his union, supports DOE and TVA consideration of the completion of the Bellefonte Plant as a tritium production facility in support of national defense because using the Bellefonte reactor would be environmentally safe and economically sound. The commentor states that he and his fellow union members have carefully analyzed the Congressional Budget Office's cost comparison of the tritium production alternatives, and they believe it makes no sense to consider any facility other than the Bellefonte reactor for tritium production. The commentor urges DOE to select the Bellefonte Nuclear Plant as a primary tritium production source because it would promote a cooperative effort between organized labor, TVA, and DOE that would save taxpayers billions of dollars.

**Commentor 619 (Don Bevill)**

1/07.03      The commentor supports TVA and the completion of the Bellefonte plant for tritium production.

**Commentor 620 (Ed Mann)**

1/07.03      The commentor states that of all the places where he has prepared environmental impact studies, he would rate the nuclear facilities at Athens, Alabama, and Spring City, Tennessee, as the finest examples of TVA's work. The commentor states that if these facilities are an example of the finished product that TVA intends at Bellefonte, somebody should think very seriously about completing the effort.

2/24.09      The commentor states that, when his group of retired engineers, scientists, and physicists met in April of last year, someone told them there was absolutely no increase in any kind of disease, including cancer, in areas where TVA facilities are operating.

**Commentor 621 (Carl Lansden)**

1/07.03      The commentor encourages DOE to make the CLWR Draft EIS a reality because, after reviewing it, he finds it difficult to believe that prudence could bring tritium production anyplace else. The commentor states that, from an economic standpoint, it is certainly desirable for the facility to be located in the area, and this is reflected in the EIS. The commentor applauds the conclusion that must evolve from the EIS—that the inhabitants of Jackson County will be the beneficiaries of the prudence displayed by DOE, TVA, and the Congressional Budget Office.

2/23.13      The commentor believes that, for the first time in modern history, the United States is enjoying a surplus in the national budget, and it would be incomprehensible to turn around and waste \$8 billion to \$10 billion to build a facility in South Carolina to accommodate DOE and the nation's need. The commentor can't believe that anyone who is functioning and is consistent with the needs of society would waste that type of money when there are so many other things for which it could be used.

**Commentor 622 (Louvain Edmondson)**

1/07.04      The commentor knows from his experience that TVA operates its plants safely.

2/07.03      The commentor has collected 450 signatures of people that have read the summary of the CLWR Draft EIS and agree that this is the right thing to do. The commentor states that they know this is a win/win situation for TVA, DOE, and the citizens of the United States and Jackson County.

**Commentor 623 (Carol Lomax)**

- 1/04.04      The commentor asks if TVA and DOE will guarantee and promise the citizens of Jackson County that mixed oxide fuel will never be used at the Bellefonte plant.
- 2/23.03      The commentor asks, since DOE and the TVA plants are government-owned, when will everybody in the nation be responsible for TVA's \$29 billion in debt, and how soon can ratepayers expect a rate reduction from the current TVA debt (i.e., why should the ratepayers be responsible for the proposed action, which they will be, since TVA has so magnanimously offered some of the money they will be making on the production of electricity to DOE, and why isn't the rest of the nation paying for the proposed action?).
- 3/15.01      The commentor states that insurance companies do not cover any losses of any type of nuclear power plant accident and asks if TVA and DOE or the Price-Anderson Act would provide 100 percent of the cost of replacement for any losses suffered by the residents of Jackson County. The commentor asks for the name of an expert on Price-Anderson coverage.

**Commentor 624 (Steven Stutts)**

- 1/07.01      The commentor, speaking for his union and a joint labor council of TVA workers, states that the Bellefonte plant should be selected by DOE as the primary tritium production source to meet U.S. defense needs because nuclear power is a proven technology that is safe and environmentally friendly. The commentor supports this position with the following statements: Bellefonte can be safely operated on a daily basis by TVA; the proposed accelerator alternative is a science project at best, since no accelerator of this size has been built or operated before. TVA's fail-safe mechanisms set the benchmark for the industry. Bellefonte meets the requirements of the U.S. Department of Defense because TVA could begin supplying tritium by 2005, as mandated by the Executive Order, while the accelerator would not be able to supply tritium until 2008. The Bellefonte option would cost \$13 billion less than the accelerator option. While the Bellefonte option would cost \$3 billion; the money spent by DOE to complete the Bellefonte plant would be repaid to the Federal Government because the revenues from electricity sales could be paid to DOE to pay off the investment with interest. Completing Bellefonte would create 800 permanent jobs and hundreds more indirect jobs, and this would have a significant economic impact on northeast Alabama, which must be strongly considered. The commentor states that, if you take all of these factors and add the appropriation of training for future work and the future generation of crafts, it sends a very strong signal and is very solid reasoning. The commentor states that using Bellefonte for tritium production would extend the past practice of using government-owned facilities for both civil and military purposes, not set a new precedent for proliferation.

**Commentor 625 (Jennifer Stephens)**

- 1/07.03      The commentor favors completion of the Bellefonte plant for tritium production to "bring the jobs back home" so that area workers won't be forced to leave their families and seek employment in other states. The commentor states that if tritium is not produced at Bellefonte, it will be produced somewhere else and all of the socioeconomic benefits will go to some other area of the country. The commentor does not want this to happen anymore.
- 2/13.05      The commentor states that, in addition to jobs, completion of Bellefonte for tritium production would benefit the local economy because workers would spend the money they earn at home, not on the road.

**Commentor 626 (Delbert Shelton)**

- 1/07.03      The commentor, after touring the Bellefonte plant, states that he was thoroughly impressed with the safety features in place, and he thoroughly supports the completion of the Bellefonte Nuclear Plant for tritium production.

**Commentor 627 (Randy Hartwig)**

- 1/07.04      The commentor, speaking for his union of TVA employees, states that they have reviewed the CLWR Draft EIS, and they agree that the environmental and health impacts associated with producing tritium in a commercial reactor would be very small.
- 2/12.02      The commentor, speaking for his union, agrees that there would be only minimal impact on the Guntersville Reservoir— less than 0.2 percent of the flow—and only minor impacts to other aquatic resources.
- 3/13.05      The commentor states that his fellow union members were ecstatic about the positive socioeconomic impacts to the area (800 jobs).
- 4/14.22      The commentor states that the radiation exposure for residents of Jackson County, including background radiation and radiation from the Bellefonte reactor operations, would be 355.26 millirem per year, a lower dose than the average for U.S. citizens overall, which is 363 millirem per year.
- 5/07.03      The commentor states that no major modifications and only a few minor ones are needed for large-scale production of tritium at either the Watts Bar or Bellefonte Nuclear Plants. The commentor, speaking for his union, believes that Bellefonte should be DOE's Preferred Alternative because of its negligible environmental impacts; absence of measurable health effects; positive economic impacts; flexible tritium production capability to meet ever-changing needs; the fact that it is a proven technology compared to the Savannah River accelerator option; the fact that there are no proliferation issues that are not manageable under existing laws and the controls associated with light water reactors; and the fact that its total cost would be less. The commentor, speaking for his union, states that TVA's engineering work force is technically robust and has consistently demonstrated its ability to solve the most difficult technical and regulatory challenges, as demonstrated by the recent "1 Rating" given to the Browns Ferry and Sequoyah Nuclear Plants.

**Commentor 628 (Ronald Forster)**

- 1/07.04      The commentor, speaking from his experience, has found TVA's safety and environmental record to be one of the highest in the industry. The commentor states that driving a car or smoking would be much more hazardous than living near the Bellefonte plant (if completed for tritium production). The commentor states that tritium production in an operating reactor is proven, safe, and efficient, and is not an experimental process.
- 2/07.01      The commentor's major concern is as a taxpayer; he fully supports completion of the Bellefonte plant because it could happen much sooner than construction of the proton accelerator plant. The commentor assumes that funding for completion of the Bellefonte plant would come from taxes. The commentor states that projected funding for completion of the Bellefonte plant would be approximately \$2 billion, while the alternative proton accelerator plant would cost approximately \$9 billion—a cost of \$7 billion more to the taxpayers.

- 3/07.03      The commentor states that future operation of the Bellefonte plant would provide a clean source of electricity for the area and would help meet the nation's increasing demand [for electricity]. The commentor states that a portion of the revenue collected from the sale of electricity would be returned to repay the taxes used to complete the Bellefonte plant, whereas the proton accelerator plant would be non income-producing and would carry a lasting debt.

**Commentor 629 (Jyles Machen)**

- 1/07.03      The commentor states that he admires TVA and supports the Bellefonte plant facility because it would be a win for everyone involved. The commentor encourages a fair and timely decision by DOE. The commentor believes the Bellefonte site meets the budget requirements; that by choosing the Bellefonte plant more than \$7 billion in Federal resources and tax dollars would be saved over the life of the program; that the Bellefonte site can meet DOE's schedule requirements because the Unit 1 reactor is more than 85 percent complete and the design requirements are firm; that it is vitally needed for the region's power grid; the nation will get its vitally needed tritium for defense, and Savannah River will get the extraction and conversion facility in South Carolina. The commentor states that some people say the Markey-Graham language in the Defense Authorization Bill, which excluded TVA, was parochial, prevented competition, and would cost billions more to risk an untested accelerator. The commentor is pleased that this language was removed in the conference between the House and the Senate. The commentor states that other people are concerned about nuclear plant safety, but there are 110 nuclear power plants operating in the United States and not a single death by radiation exposure has been documented. The commentor believes TVA is up to the job because it is the nation's largest power producer and its Browns Ferry and Sequoyah Nuclear Plants recently earned the highest performance evaluation rating possible. The commentor further states that TVA has new leadership and positive management and can again serve the nation and the region.
- 2/24.06      The commentor states that tritium produced at Bellefonte will be transported in its solid state to a new \$400 million extraction facility at DOE's Savannah River site, which will provide employment for roughly 300 people.

**Public Hearing – Evensville, Tennessee  
October 8, 1998**

**Commentor 700 (Steven Smith)**

- 1/06.03      The commentor asks why DOE is talking so much about the Watts Bar and Sequoyah plants if, as reported by the media, TVA has removed the plants from consideration for tritium production. The commentor understood that DOE would use Watts Bar for tritium production only if there were problems at the Bellefonte plant, and that DOE's primary objective is to use the Bellefonte plant only for tritium production. The commentor asks for clarification on these points.
- 2/23.22      The commentor states that using the Watts Bar plant only for tritium production clearly is the least expensive reactor option and asks why TVA let this option expire. The commentor suggests TVA's reason was to preclude the lower priced option (Watts Bar only) so that Federal monies could be obtained to finish the Bellefonte Plant.
- 3/23.16      The commentor requests documentation to support DOE's conclusion that purchasing irradiation services at Watts Bar would be less expensive in the near term, but more expensive over the long



- term (plant life-cycle). [Commentor refers to a comparison of the tritium production costs for the Watts Bar and Bellefonte plants that DOE sent to the U.S. Congress.]
- 4/23.04 The commentor asks who would benefit from electricity sales revenues obtained from a completed Bellefonte Nuclear Plant—the taxpayers, TVA, or DOE?
- 5/17.16 The commentor asks if the speaker meant to say that: (1) reactor units at either the Watts Bar or Sequoyah plants would generate 75 percent more spent fuel if they were run at the higher rate required for tritium production; and (2) spent fuel generation would double if tritium were produced in one of the Bellefonte units.
- 6/03.03 The commentor asks about the size of DOE’s projected target irradiation goal.
- 7/17.17 The commentor states that tritium production in excess of 2000 targets per year would generate additional spent fuel. The commentor requests clarification concerning whether any of the three TVA nuclear power plants is capable of managing their existing and projected spent fuel load and whether adding to it would only complicate the situation.
- 8/06.05 The commentor asks when DOE would use two or more facilities to avoid exceeding the Bellefonte plant’s spent fuel generation limits. The commentor believes the analyses that will determine DOE’s choice to use one or more reactors for tritium production should be made public because of the implications for TVA ratepayers and U.S. taxpayers.
- 9/06.06 The commentor is unclear concerning what the dots mean in the “measle chart” on page 3-12 of the CLWR Draft EIS and on page 18 of the CLWR Draft EIS Summary. The commentor would like to see the actual numbers, instead of dots, that were used to analyze the associated impacts of each alternative.
- 10/23.05 The commentor believes cost overruns are likely if TVA plants are used for tritium production. The commentor asks whether the CLWR Final EIS will include information concerning the potential liability of ratepayers for cost overruns. If not, the commentor asks why, when a TVA cost overrun in completing the Bellefonte plant would have socioeconomic impacts on TVA’s debt reduction plan and, consequently, on area ratepayers. The commentor requests DOE to guarantee that the CLWR Final EIS will contain more discussion and analysis of the potential risks and consequences of cost overruns. The commentor believes that not doing so would be a mischaracterization of the NEPA process.
- 11/02.02 The commentor believes DOE has not made a compelling argument for the United States’ near-term need for tritium, and that the CLWR Draft EIS is flawed because the numbers for the current U.S. tritium inventory are not provided.
- 12/03.01 The commentor believes that, before U.S. taxpayers are asked to pay several billion dollars for tritium production, the amount of tritium in U.S. inventories should be declassified and made publicly available so that citizens can determine when a real need for tritium will arise.
- 13/02.01 The commentor believes the United States should aggressively pursue the START II Treaty, which would extend the required date for new tritium production to 2016, or up to 2020, or to 2030.

- 14/05.02 The commentor believes the No Action Alternative discussed in the CLWR Draft EIS does not fully consider *no action* (i.e., avoiding new tritium production at this time); thus, it is not a true No Action Alternative under NEPA.
- 15/01.04 The commentor believes the discussion of nonproliferation impacts and issues in the CLWR Draft EIS is woefully inadequate. The commentor believes the United States' violation of its own nonproliferation policy, a policy that the United States seeks to impose on other countries, is hypocritical and encourages other nations to do likewise. The commentor points out that *Janes Defense Review* reports that India got its weapons tritium from a commercial reactor. The commentor believes the United States' nonproliferation concerns have significantly increased since the CLWR Draft EIS was issued, and there should be greater discussion about nonproliferation in the CLWR Final EIS.
- 16/01.09 The commentor disagrees with the conclusions of the authors of the *Interagency Review of the Nonproliferation Implications of Alternative Tritium Production Technologies Under Consideration by the Department of Energy*, and says this document cites no clear historic examples of using commercial nuclear facilities for military purposes. The commentor believes that by basing its assumptions about the nonproliferation impacts of CLWR tritium production on the examples cited in the *Interagency Review*, DOE is making an illogical argument and defying current U.S. nonproliferation policy.
- 17/23.06 The commentor is disconcerted as a TVA ratepayer to learn that, first, Chairman Crowell stated in TVA's 1996 Integrated Resource Plan that TVA will not engage in further nuclear power plant construction without a full partner, and now, under one of DOE's tritium production scenarios, TVA would invest \$4.5 billion (essentially its current expenditures for construction of Bellefonte) into the partnership with DOE, resulting in someone else (DOE) completing the reactor at no additional cost to the ratepayers. The commentor believes DOE's CLWR tritium production proposal is nothing more than a thinly veiled attempt to subsidize TVA's attempts to complete the Bellefonte reactor with taxpayer money.
- 18/23.07 The commentor believes DOE needs to understand how delicate and fragile the contractual situation is with TVA's distributors, as well as the liabilities related to TVA's ability to meet the obligations of its 10-year debt [reduction] plan and the restructuring of the electric utility environment. The commentor believes these issues are significant and should be addressed socioeconomically to evaluate their long-term implications for the Tennessee Valley and for U.S. taxpayers.
- 19/06.04 The commentor asks whether the CLWR Final EIS will include information about the contractual agreements between TVA and DOE and the potential impacts of TVA's contract obligations.
- 20/01.02 The commentor thinks the real battle is yet to come before \$2 billion is appropriated by the Congress for this project.

**Commentor 701 (Ernest Haston)**

- 1/04.01 The commentor requests a comparison of the technical risks associated with the CLWR tritium production option and the APT option. The commentor asks whether the technical risks for the two options will be included in the CLWR Final EIS or only in the final decision.

- 2/11.13      The commentator suggests the use of a device that measures wind velocities to gather data on prevailing winds in the region near the Watts Bar site (this device is already available at the plant).

**Commentor 702 (Ralph Hutchison)**

- 1/05.23      The commentator asks that DOE not try to intimidate or dismiss the public by saying, “Well, we’re not going to do that,” because commentators can only refer to the information they’ve been given.
- 2/05.30      The commentator states that the analyses of DOE’s “most likely scenario” (2,000 TPBARs) are not in the CLWR Draft EIS, although some analyses apparently have been done. The commentator states that if DOE has a scenario other than those presented in the EIS, a scenario based on undeveloped, undetermined, secret information, the public can’t comment on it, and that is a frustrating problem.
- 3/05.04      The commentator asks if DOE is going to pursue both the primary and back-up options (CLWR or APT) for tritium production; what the terms “primary” and “back-up” mean; and whether both options have been or will be developed.
- 4/23.16      The commentator asks whether DOE’s economic analysis includes the costs of pursuing the CLWR and APT options as both primary and back-up alternatives to each other.
- 5/23.15      The commentator asks what percentage of the accelerator program would DOE actually pay for—i.e., of the nine billion total, how much is for the design, and vice-versa.
- 6/05.10      The commentator asks whether there is any incremental release of tritium from the TPBARs being tested in the Lead Test Assembly tests at Watts Bar.
- 7/01.02      The commentator wonders whether DOE is aware that the vote on the Markey-Graham Amendment was close and the U.S. House of Representatives was “pretty solidly in support of Markey-Graham.”
- 8/01.05      The commentator wonders whether the *Interagency Review* panel (on nonproliferation issues associated with CLWR tritium production), DOE, etc., have decided it is permissible for India, Iraq, and North Korea to produce tritium in their commercial reactors for use in nuclear weapons.
- 9/01.01      The commentator thinks that many people are concerned about the United States’ possession of nuclear weapons.
- 10/14.05      The commentator asserts that DOE would like the public to believe tritium production would have little or no environmental impacts, but says the CLWR Draft EIS states that, under the “normal operations, no accident scenario” for tritium production operations at Watts Bar, releases to the air would be 60 times higher than current levels, while total tritium releases to water would be five times greater than normal. In addition, under normal operations, the annual radiation dose for people living as far as 50 miles away from the Sequoyah Nuclear Plant would triple as a result of tritium production. The commentator further states that during accident conditions tritium releases to the air at Watts Bar would increase by nearly 300 times, and tritium releases to water would be nearly 30 times higher than normal. The commentator feels it is unfair for DOE to communicate information in the public meetings that is not found in the EIS. The commentator believes that DOE should highlight the actual expected releases of tritium to the environment to

inform the public that, while the TPBARs were reported to be virtually leakproof a year or so ago, they are now assumed to leak 1 Curie of tritium per year, which is a lot of tritium.

- 11/01.04 The commentor states that the attempt made in the CLWR Draft EIS to skirt the significant nonproliferation concerns of the public by citing four instances of "exceptions to the practice of differentiating between the U.S. civilian and military facilities," each of which involved military facilities used for civilian purposes, is disingenuous, outrageous, and absurd. The commentor states that, while some people believe it is appropriate for us to do what we demand of others, our government seems to arrogate to itself the privilege of doing whatever it chooses and denying that same privilege to other countries. The commentor objects to the statement in the CLWR Draft EIS declaring that the TVA reactors are technically owned by the U.S. Government, making them roughly comparable to past instances of government-owned dual-purpose nuclear facilities. The commentor believes this statement insults the public's intelligence and is duplicitous. The commentor states that on page F-10 of the CLWR Draft EIS, the response to the third comment on that page, DOE's assertion that tritium production is consistent with and is fully supported by the commitments of the United States under a variety of treaties, including the Nonproliferation Treaty, is a lie. The commentor reports that the International Court of Justice ruled in 1996 that the United States is not upholding its treaty obligations under the Nonproliferation Treaty, and production of tritium for the sole purpose of maintaining a large arsenal into the next century directly contradicts the United States' obligation under Article VI of the treaty.
- 12/21.03 The commentor states that, given the half-life of tritium, at least half of any tritium produced in the year 2005 would not be available when it is truly needed in 2016, so DOE would have to produce twice as much tritium in 2005 to meet its needs in 2016. The commentor believes that it doesn't make sense to produce tritium until it's needed, and earlier, unnecessary tritium production only increases the risks and the likelihood of environmental impacts.
- 13/22.01 The commentor states that the CLWR Draft EIS does not consider the risks of an attack by hostile forces on the proposed plants, but should do so because they would be making materials essential to the U.S. arsenal of nuclear weapons and would be the least protected and safeguarded of all U.S. nuclear weapons facilities.
- 14/05.05 The commentor states that the CLWR Draft EIS says conversion of the Bellefonte plant to fossil fuel is independent of this EIS, but also says such conversion would not occur until after a decision is made regarding the role of Bellefonte 1 and 2 in tritium production—indicating that conversion *is* dependent on the outcome of this EIS and the Bellefonte conversion EIS has been held up pending completion of this CLWR EIS. The commentor believes the CLWR EIS should acknowledge this fact.
- 15/13.08 The commentor states that, regarding environmental justice, it's not enough to assert that the impacts are not being disproportionately visited on people of color or low-income communities, nor is it adequate to disguise the adverse impacts on specific populations by describing a wide circle around the plant and making generalizations about the population living there. For example, the closest community to the Sequoyah plant is Soddy-Daisy, whose population is at less than half the income level for Hamilton County, which is circumscribed by a large circle.
- 16/20.02 The commentor states that the CLWR Draft EIS fails to include a comparison of the eventual costs of decontaminating and decommissioning Bellefonte as a nuclear site and as a fossil fuel electricity generating plant—which it should do, since those are the two possible futures for the plant.

- 17/01.10      The commentor states that the response to the final comment on page F-12 of the CLWR Draft EIS asserts that, “moral and ethical issues are beyond the scope of the Environmental Impact Statement.” The commentor reminds DOE that NEPA clearly states an EIS must consider the whole of the human environment. The commentor believes that decisions to protect the natural environment and wildlife are moral ones, as are the inclusion of environmental justice concerns and economic issues, and it is possible to consider and even quantify the effects of many moral decisions. The commentor states that moral and ethical issues are already abundant in this EIS, and the issues raised in the scoping meeting, while uncomfortable to contemplate and difficult to quantify, deserve full consideration throughout this decision-making process. The commentor asks that DOE not forget that the CLWR EIS is about the making of weapons of mass destruction, which is a monstrous thing.

**Commentor 703 (Ann Harris)**

- 1/11.01      The commentor asks for a description of TVA’s current wastewater program and procedures for cleaning up the reactor coolant wastewater prior to releasing it into the river; the schedule for testing the program to ensure its reliability; the criteria the NRC uses to monitor the program; and where this criteria may be found.
- 2/11.04      The commentor asks: (1) who is ultimately accountable for determining how much tritium can be released into the Tennessee River; (2) who has the authority to determine whether the procedures for the current wastewater program are correct; and (3) is the current program capable of providing complete and accurate numbers for the amounts of tritium that would be released into the river.
- 3/03.03      The commentor asks where in the CLWR EIS is it explained that, to meet its annual tritium production requirements, DOE probably would use a combination of the Watts Bar, Sequoyah, and Bellefonte Nuclear Plants. The commentor feels this information is hidden in the document.
- 4/18.05      The commentor asks whether transporting TPBARs from three different reactors in two states would increase the opportunities for a transportation accident.
- 5/18.06      The commentor asks whether DOE plans for a single truck to pick up irradiated TPBARs at each reactor and transport them collectively to the Savannah River Site.
- 6/24.13      The commentor asks for clarification concerning the cumulative effects of using three reactors simultaneously at three different sites.
- 7/19.06      The commentor asks why DOE assumed the failure of two TPBARs, which the commentor understands to be the national average, instead of the failure rate experienced by TVA alone.
- 8/14.03      The commentor asks whether DOE’s analyses of the impacts of tritium production on the affected environment are based on current prevailing winds. The commentor points out that, according to the National Weather Service, 90 percent of the prevailing winds in the local area come straight up from Alabama to the [Tennessee] state line and do not expand widely. The commentor states that the graphics in the CLWR Draft EIS used to illustrate the area should be corrected because the lines run 50 miles in any one direction and do not reflect the national average for these valleys.

- 9/05.17 The commentor suggests DOE should not use five- and six-year old documentation for the CLWR EIS because Bellefonte hasn't had an EIS in this decade; the EIS for Watts Bar is three years old; and there have been some major weather changes recently.
- 10/14.02 The commentor reports that, according to the International Geological Society and the National Geology Group, it's improper to use a 50-mile radius around each of the TVA plants for impact analyses in this particular region. The commentor, therefore, believes the maximum meteorological impact assumed in the CLWR EIS in order to multiply that impact for the entire 50-mile radius is understated. The commentor suggests shaping these areas more like an oblong than a circle to account for the narrow corridor in which the prevailing winds move.
- 11/23.10 The commentor asks for clarification on DOE's position that, if TVA has an overrun on their bid for tritium production, DOE will not share in it and the overrun will be handled by TVA. The commentor asks what TVA will do in the case of a cost overrun.
- 12/15.01 The commentor wants DOE to address in the CLWR EIS how replacement costs for damage to private property would be handled if an accident occurs.
- 13/09.06 The commentor wants DOE to address in the CLWR EIS how TVA, the NRC, and DOE will establish a safe work environment where workers are free to raise safety issues. The commentor wants DOE to address in the EIS how workers will be protected from management abuse to the greatest and furthest extent of the law. The commentor asks the source for the numbers quoted in the EIS regarding abused employees that have been harmed as a result of raising safety issues at TVA.

**Commentor 704 (Michelle Conlon)**

- 1/05.18 The commentor believes the EIS process is very one-sided and thinks DOE and other Federal agencies may need to review it.
- 2/05.19 The commentor would like to see DOE's presentation of the CLWR EIS information to the public accompanied by a presentation from an independent reviewer.
- 3/14.23 The commentor thinks the DOE presentation failed to sufficiently emphasize the high radioactivity of tritium.
- 4/03.01 The commentor asks whether the amount of tritium currently stored in U.S. Government inventories is public knowledge, and if not, why not. The commentor believes the public needs to know the exact amount to make an informed decision about CLWR tritium production.
- 5/19.12 The commentor asks why DOE says the TPBARs would be under less stress in the reactor core than standard burnable absorber rods.
- 6/01.12 The commentor asks why DOE and the Federal Government are moving so quickly on tritium production, and why Secretary of Energy Bill Richardson believes he has to make the technology decision before the end of the calendar year.
- 7/24.06 The commentor asks whether DOE plans to proceed with extracting tritium from the irradiated TPBARs immediately after their arrival at the Savannah River Site and, if not, how long the irradiated TPBARs might be stored at the site.

- 8/02.02 The commentor questions the need to produce tritium by 2005 to 2007 if the plan calls for storing the tritium while it decays (i.e., wouldn't it be better to produce tritium only when it is actually needed?).
- 9/05.10 The commentor asks how many TPBARs were inserted into the Watts Bar reactor to conduct the Lead Test Assembly tests. The commentor is pleased to note that another person thought it was important for DOE to report the results of the Watts Bar Lead Test Assembly test because the commentor believes such information is critical to the EIS process.
- 10/24.22 The commentor asks how many TPBARs were inserted into the Advanced Test Reactor.
- 11/06.04 The commentor points to text in the CLWR EIS Summary document that describes DOE's dual track approach for tritium production and asks when DOE plans to exercise its option to purchase irradiation services.
- 12/23.01 The commentor wishes to make it clear that the ratepayers in Tennessee are ultimately responsible for the costs currently being incurred by TVA for the construction of Bellefonte (TVA issues bonds, but the bonds are the responsibility of the ratepayers). The commentor states that, as a result, the Federal Government's argument that it already owns the TVA plants is thin.
- 13/21.04 The commentor asks when the NRC's review of the Production Core Topical Report and its plant-specific reviews will be available to the public.
- 14/07.06 The commentor states that constructing the Bellefonte plant as a natural gas facility is just as viable as completing Bellefonte as some nuclear facility with tritium production, and both would create jobs.
- 15/07.02 The commentor doesn't believe that residents of the Tennessee Valley need this project to survive. The commentor, as a young person, doesn't want to live with this legacy in the Tennessee Valley and encourages DOE not to proceed with the decision to produce tritium in a civilian nuclear power plant.
- 16/23.10 The commentor is extremely uncomfortable with ratepayers in the Tennessee Valley being asked to subsidize DOE's nuclear power program.

**Commentor 705 (Bill Monroe)**

- 1/21.01 The commentor asks whether TVA would expect the operational technical specification limits to remain the same under tritium production.

**Commentor 706 (Greg DeCamp)**

- 1/06.03 The commentor requests clarification about which of the 18 CLWR tritium production alternatives remains practically viable after the expiration of TVA's irradiation services offer (i.e., how many of the 18 options are really practical at this point?). The commentor asks if TVA and DOE are in agreement that, despite TVA's withdrawal/expiration of its offer to sell/lease the irradiation services of the Watts Bar plant, all five of the TVA reactors are still being considered for tritium production.
- 2/23.08 The commentor asks if TVA's offer for tritium production includes a fixed price.

- 3/23.09 The commentor thinks the CLWR EIS would benefit from including more information about the actual costs of the various alternatives and the implications of the costs for the specific economic proposals being considered (e.g., if the project costs \$1.9 billion, who will be responsible for supplying the rest of the money if the costs exceed the fixed price?).
- 4/23.10 The commentor asks if TVA plans to pass on the cost of an overrun on its fixed price contract with DOE to ratepayers and, if not, is TVA subsidized by some other means.
- 5/24.10 The commentor asks for clarification of a statement found in the CLWR Draft EIS summary that indicates no design changes would be necessary to complete Bellefonte for tritium production. The commentor suggests the clarification be added to the summary document for the CLWR Final EIS.

**Commentor 707 (Michelle Caratoo)**

- 1/06.05 The commentor asks to know if DOE's preferred choice for tritium production would involve several different sites. The commentor believes it might simplify the process if all the necessary activities were performed at one site.
- 2/18.07 The commentor believes the additional shipping requirements for tritium production are likely to cause accidents and traffic problems. The commentor believes the transportation accident risk found in the CLWR Draft EIS is exceedingly low—less than one fatal accident per hundred thousand years is unrealistic. The commentor wonders whether other agencies like the Tennessee Emergency Management Agency or Federal Emergency Management Agency have plans to deal with any accidents, because accidents are inevitable in any line of work.
- 3/02.02 The commentor asks if the new tritium produced between 2005 and 2007 would likely decay if it has to wait 20 years before it's used and, if so, wouldn't it be better to produce it only when it is actually needed. The commentor asks why new tritium production couldn't wait until 2017 if the United States does not need tritium until 2020. The commentor thinks that, if we don't need tritium until 2020, perhaps we can spend a little more time investigating different ways to make it, and maybe the accelerator or some other way would be a simpler procedure.
- 4/24.03 The commentor asks if the amount of tritium now possessed by the United States is losing its efficiency or is leaking somewhat and, if so, is there no way to prevent this loss.
- 5/01.04 The commentor considers the Nonproliferation Treaty to be something important that the country has signed and believes we need to start keeping our treaties.
- 6/01.09 The commentor doesn't want other countries to use their civilian nuclear facilities for military purposes, so the United States needs to set a good example and do likewise. The commentor doesn't recall any other place in the United States where new nuclear facilities to produce energy or military products are being used. The commentor wonders why TVA is opening a new facility at this time. The commentor believes this activity is contrary to the current national trend, and there is probably a good reason for that trend.
- 7/08.02 The commentor is concerned that there is so much left from past [weapons] projects to clean up, such as at Oak Ridge and other facilities. The commentor wonders who is responsible for doing that and whether that's something we also could be working on at the same time.



- 8/23.13      The commentor believes it doesn't make sense to start a new project when the previous ones haven't been completed and these would probably take a great number of brilliant engineering minds and many jobs to clean up. The commentor would like to see the U.S. Government work on that, starting now—perhaps with the use of Superfund monies. The commentor would like part of the Federal budget to be spent developing more renewable energy resources for the present and the future instead of starting new nuclear projects.
- 9/05.24      The commentor invites DOE to do a presentation on CLWR tritium production in Nashville, Tennessee.
- 10/12.01      The commentor is concerned that TVA is divesting some of its recreational properties, like the Land Between the Lakes, and putting so much energy into this project. The commentor would like TVA to keep that project and maybe turn it over to the Wildlife Resources Agency or some other agency to maintain. The commentor believes it is not fair to take land from private citizens for valley uses and then just dump it to some other agency; the land should go back to the people or some other thing like that.
- 11/23.11      The commentor is concerned about TVA's debt—maybe TVA should take a little breather before starting another project and incurring more debt.
- 12/20.04      The commentor is concerned that the costs for eventually mothballing and decontaminating TVA's plants will be very high and this issue was not addressed in the CLWR Draft EIS.
- 13/24.02      The commentor is concerned that, whether we're producing electricity or making tritium, it seems like we pick the most complicated processes—like nuclear energy, which is a very complicated way to make steam or heat or boil water. The commentor wonders if using highly complicated processes make mistakes and failures more likely. The commentor suggests more time should be spent figuring out how to make the process (nuclear power) safe, or it should be abandoned until we can find a safer way to do this.
- 14/20.01      The commentor wonders who will be responsible for the cleanup of this project, because many jobs could be created by cleaning up past projects.
- 15/13.05      The commentor believes tritium production may not be the best way to create jobs.
- 16/04.04      The commentor states that burning uranium and mixed oxide fuels, as is occurring at Oak Ridge, is not an acceptable way of dealing with the waste. The commentor would like to see the development of a better way of dealing with it.
- 17/14.24      The commentor believes the cancer fatalities listed under environmental impacts in the EIS are exceedingly low and inaccurate, if recent newspaper stories are true.
- 18/20.03      The commentor thinks DOE and TVA should consider the long-term effects and the cleanup and the decontamination aspects of CLWR tritium production, which are all parts of the process, before starting such a project.

**Commentor 708 (Bill Griffith)**

- 1/07.03      The commentor and his employer have reviewed the CLWR Draft EIS and offer their compliments to DOE on its thoroughness. The commentor also agrees with the EIS conclusions

concerning the public safety and environmental impacts of CLWR tritium production at the Bellefonte nuclear power station.

**Commentor 709 (Fred Boggess)**

1/07.03      The commentor and his labor union agree with the conclusions of the CLWR Draft EIS and support completion of the Bellefonte plant for tritium production because it is both economical and good for the taxpayers and ratepayers of the valley.

**Commentor 710 (Leroy Beasley)**

1/07.04      The commentor believes the Bellefonte plant is probably the safest and the best documented nuclear plant that TVA has, and that the plant would “stand head and shoulders” above most of the nuclear plants designed in America. The commentor has no concerns about the safety of TVA’s other nuclear plants.

2/07.03      The commentor and his organization have reviewed the CLWR Draft EIS, and they accept and support its conclusions about the completion of the Bellefonte nuclear plant.

**Commentor 711 (Louvain Edmondson)**

1/07.04      The commentor and his organization are confident that TVA’s nuclear plants are safe. The commentor recognizes the need for tritium to preserve the U.S. nuclear deterrent. The commentor takes issue with charges that TVA is always “over budget and over schedule,” citing record performance at the Sequoyah plant. The commentor brought a petition to the last public meeting with 450 signatures of people, mostly engineers, who had read the CLWR Draft EIS summary and agreed with its conclusions. The commentor has brought an additional 69 signatures to present to this meeting and states that his organization, the engineers at the Sequoyah plant, and many people from the Bellefonte plant are in full support of CLWR tritium production. The commentor believes CLWR tritium production is the right thing for the people of the valley and of the nation because all the people can benefit from it and it will save the ratepayers a lot of money.

**Commentor 712 (Linda Ewald)**

1/10.03      The commentor is opposed to tritium production because of the increased risk of environmental contamination.

2/14.04      The commentor is opposed to tritium production because of human health hazards.

3/16.04      The commentor is opposed to tritium production because of nuclear waste production.

4/01.10      The commentor is opposed to tritium production because of the immorality of its use in nuclear weapons.

5/02.02      The commentor believes the United States does not need tritium by the year 2005. By DOE's calculations, the United States can maintain its current, huge arsenal without producing tritium until 2016. The commentor believes that if the [U.S. nuclear] arsenal is reduced, as experts claim it can and should be, no new tritium would be needed until 2032. The commentor believes that Federal funding to begin tritium production by 2005 would be wasted because, with tritium’s decay rate, half of the tritium produced would be gone by the time it is actually used.

- 6/23.13      The commentor suggests the \$2 billion for tritium production would be better used to create 20,000 valuable jobs.
- 7/01.04      The commentor believes that CLWR tritium production would be a violation of the 1970 Nuclear Nonproliferation Treaty. The commentor thinks it is hypocritical for the United States to criticize other nations for their use of commercial reactors to produce nuclear weapons material while we make plans to produce tritium in our civilian reactors. The commentor states that, as a taxpayer, a ratepayer, and a human being, she does not want to support the production of tritium or any other nuclear weapons material. The commentor thinks that weapons of mass destruction threaten all of creation, and DOE's CLWR tritium production proposal sets a precedent that will destroy the United States' national nonproliferation efforts. The commentor urges the individuals with the power to make decisions to consider the long-term consequences of tritium production and whether the short-term gain is worth the risks to our health, our home, and our future.

**Commentor 713 (Steve Tanner)**

- 1/05.20      The commentor commends DOE and TVA for the thoroughness and depth of the CLWR Draft EIS. The commentor believes that all the potential impacts have been identified and thoroughly evaluated.
- 2/23.15      The commentor believes the APT option is a way for some people to fund their own retirements through a pork barrel program paid for by taxpayer dollars.
- 3/01.02      The commentor believes that political considerations are the only reason for proposing to site the accelerator in South Carolina. The commentor is pleased that, in making decisions about tritium production, some members of Congress have kept DOE on the steady path of determining what is best for the United States and have supported basing the decision on merit, not politics.
- 4/01.04      The commentor believes that, until total world nuclear disarmament is achieved, the right action is for the United States to maintain a safe and reliable nuclear deterrent, which will require tritium. The commentor believes that building an accelerator as a new nuclear defense production facility that is part of the nuclear weapons complex is not the right action because: (1) the accelerator facility would be capable of producing fissile materials such as plutonium and uranium and would be controlled by the nuclear weapons complex; (2) it probably would not be subject to International Atomic Energy Agency accountability inspections; and (3) it would use technology that is not under current export controls, carries high risk and has major proliferation implications. The commentor believes that DOE's purchase of irradiation services through a financial arrangement with TVA that allows the completion of Bellefonte is consistent with the direction the United States has been taking regarding military versus civilian technology uses. The commentor thinks that DOE's dual-use technology policy recognizes that the nation can no longer afford to maintain two distinct industrial bases and allows the armed forces to exploit commercial industry's rate of innovation to meet defense needs.
- 5/07.01      The commentor believes the right action for tritium production is to use a CLWR because it would support the dual-use technology policy. The commentor believes tritium production would not violate any laws, treaties, or policies. The commentor believes tritium production would provide greater government control in the DOE nuclear weapons complex, which is managed by private sector companies who are in business for profit, while TVA reactors are managed and operated by government employees.

- 6/06.05      The commentor recommends that DOE identify the Bellefonte facility (backed up by the Watts Bar as needed) as its Preferred Alternative in the CLWR Final EIS.
- 7/04.01      The commentor requests DOE to move expeditiously to eliminate any further funding of the APT project or, at a minimum, rename that project the "Fund Our Retirement Production of Tritium" project.

**Commentor 714 (Clyde Caldwell)**

- 1/07.03      The commentor states that he, together with his union and the members of his local trades and labor council, favors completing the Bellefonte plant because it is a win-win situation for the country, TVA, and the citizens of this valley. The commentor informs DOE that TVA has a \$4.5 million investment sitting in northern Alabama and, because of the number of construction workers required, completing and operating Bellefonte for tritium production will provide employment and associated economic benefits not only for northern Alabama, but also for eastern Tennessee and all the way to Birmingham (in central Alabama). The commentor states that completion of the Bellefonte plant would allow TVA to recoup part of its \$4.5 million investment while producing badly-needed tritium to secure public safety and security. The commentor states that the Bellefonte plant is one of the highest quality plants that's ever been built in the nuclear industry. The commentor, because of the lessons learned in completing the Watts Bar plant, does not anticipate significant problems in completing the Bellefonte plant and encourages DOE to use the Bellefonte facility for tritium production. The commentor is not concerned about the safety of TVA nuclear plants. The commentor states that safety is not a major concern of the people he represents because they intend to operate the [TVA] plants and build them as safely as they can be built. The commentor believes that nuclear is a clean, safe power source. The commentor points out that, although he's heard about the danger of tritium, he has some tritium on his watch face and has seen it in nursery decorations and other things for children. The commentor believes tritium production is necessary because the United States cannot defend itself without nuclear weapons.
- 2/24.11      The commentor wants to make it clear that TVA will own the facility and at no time will it be sold or given to DOE.

**Commentor 715 (Ronald Forster)**

- 1/07.03      The commentor and his company have reviewed the CLWR Draft EIS and agree wholeheartedly with the safe production of tritium in a CLWR. The commentor, after investigating regional electricity rates, believes an increase in TVA's rates would be justified in return for enabling TVA to pay off some debt, change the liability of the Bellefonte plant into an electricity-producing asset, and use the revenues from Bellefonte to repay some of the tax monies used to complete the plant. The commentor, as a taxpayer, wants to see things completed sooner rather than later and believes the Bellefonte plant would be completed sooner for tritium production than the accelerator. The commentor believes the United States needs to have the availability of a tritium production source and needs to make the decision about where to produce it. The commentor believes completion of the Bellefonte plant makes sense to meet the increasing need for electricity in the area and to help stabilize rates. The commentor believes that \$2 billion to complete Bellefonte for tritium production, relying on a well documented technology that works better than expected, versus \$9 billion to build an accelerator for tritium production, using an untested, unknown, experimental version of the technology, should be a logical decision for taxpayers.

**Commentor 716 (Jennifer Stephens)**

- 1/07.03      The commentor favors completion of the Bellefonte plant for tritium production to “bring the jobs back home” so that area workers won’t be forced to leave their families and seek employment in other states. The commentor states that, in addition to jobs, completion of Bellefonte for tritium production would benefit the local economy because workers will spend the money they earn at home, not on the road. The commentor states that, if tritium is not produced at Bellefonte, it will be produced somewhere else and all of the socioeconomic benefits will go to some other area of the country. The commentor does not want this to happen anymore.

**Commentor 717 (James Roberson)**

- 1/07.04      The commentor supports TVA management and employees in operating a tritium-producing facility because they have proven they can handle related plants and projects for the people of the United States. The commentor states that the Tennessee Valley has expertise available [to support tritium production].

**Commentor 718 (Rex Wilson)**

- 1/07.03      The commentor and his labor union urge the completion of Bellefonte and the use of Sequoyah and Watts Bar as backup units. The commentor appreciates TVA for bringing electricity to the area. The commentor believes TVA is fair with people. The commentor urges DOE to do the right thing and select Bellefonte, finish it, use it, and then use Watts Bar and Sequoyah as backup units to bring some jobs in the area.

**Commentor 719 (Mark Wheeler)**

- 1/03.01      The commentor asks if the U.S. tritium supply is classified. The commentor wonders how persons who have access to that classified information can say we need more tritium by 2005, but others who don't have access can come up with figures like 2016 and 20 years and 30 years down the road. The commentor is not willing to make an assumption and risk national security.
- 2/23.15      The commentor understands the cost of the Bellefonte option is estimated at about \$2 billion, and the accelerator at the Savannah River Site would cost about \$9 billion. The commentor suggests the cost estimates for each option indicate which is the best.
- 3/07.03      The commentor believes that, as tritium production will occur somewhere, it should be done in the local area where area residents can benefit from it. The commentor and his labor union strongly support tritium production at Bellefonte because it will be safe, great for the country, and great for the Tennessee Valley.
- 4/05.20      The commentor thinks the CLWR Draft EIS does an excellent job covering the options and statistics.
- 5/07.04      The commentor, who works at the Sequoyah plant, has absolutely no safety concerns and is very impressed with the plant's redundant safety systems. The commentor, speaking as an official of his labor union, states that the workers know how safe the plant is and if they thought anything was unsafe, they would be opposed to building these plants.

**Commentor 720 (Terry Johnson)**

- 1/01.01      The commentor believes the United States' nuclear deterrence policy and program has worked, and we need to continue to make it work.
- 2/08.02      The commentor thinks one of the biggest problems affecting CLWR tritium production is that, because of past history, we don't trust each other.

***The following commentors (800 through 835) made comments at the December 14, 1998, public meeting concerning TVA's latest proposals to DOE for use of Watts Bar, Sequoyah, and Bellefonte.***

**Public Hearing – Evensville, Tennessee  
December 14, 1998**

**Commentor 800 (John Johnson)**

- 1/24.24 The commentor asks what “point of departure” means as used in the slide presentation.
- 2/23.02 The commentor asks that, given the costs of \$11 billion and 23 years to complete the Watts Bar Plant, why does DOE think they can complete the Bellefonte Plant for less.
- 3/16.01 The commentor asks what DOE will do with the nuclear waste generated by tritium production.
- 4/05.31 The commentor states that it is bad timing to hold the meeting during the holiday season and complains that he did not receive any personal notice of the meeting, although he is on the stakeholder mailing list.
- 5/01.04 The commentor states that he is opposed to tritium production because it violates the spirit of the Nonproliferation Treaty and sends a wrong message to other countries.
- 6/01.01 The commentor states that the Cold War is over. The commentor urges DOE to obtain tritium from existing nuclear weapons. The commentor states that tritium production will subvert the human race to the will of the national security state, serves the imperatives of technology, is all about money, greed, and death, and demands that DOE cease and desist in its tritium production plans at once.
- 7/24.21 The commentor asks what DOE will do if TVA is dismantled as a result of deregulation.
- 8/24.19 The commentor asks if DOE and TVA are in Y2K compliance.
- 9/08.02 The commentor states that DOE’s track record belies its promises.

**Commentor 801 (Ronnie Boles)**

- 1/06.03 The commentor asks whether TVA has a legal or contractual obligation to partner with DOE on any of the current tritium proposals.

**Commentor 802 (Michelle Conlon)**

- 1/05.27 The commentor asks whether DOE still has the option to buy a reactor.
- 2/23.23 The commentor asks what effect irradiation services at Watts Bar and Sequoyah Plants will have on ratepayers, and whether electric rates would change.
- 3/05.10 The commentor asks what will be done with the TPBARs used in the Lead Test Assembly demonstration at Watts Bar and when will it be completed. Since tritium will not be extracted from the TPBARs used in the lead test assembly demonstration, how will we know the production process works without extracting the tritium.
- 4/05.31 The commentor criticizes the process and states that it appears there has been a lot of discussion after the public comment period was closed. The commentor suggests DOE do things differently in the future. The commentor complains that she did not get copies of Chairman Crowell’s letter before this meeting and says this is unfair.



- 5/01.15 The commentator warns Vice President Gore about the damage his support for the proposed action will do to his presidential campaign in 2000.

The commentator submits the following document along with her written statement: Zerriffi, Hisham and Herbert Scoville, Jr., *Tritium: The Environmental, Health, Budgetary, and Strategic Effects of the Department of Energy's Decision to Produce Tritium*, Institute for Energy and Environmental Research, Takoma Park, Maryland, January 1996.

**Commentor 803 (Steven Smith)**

- 1/23.24 The commentator asks for clarification regarding the [cost] numbers given for the Watts Bar and Sequoyah Plants in the presentation. What is the breakdown that led to TVA's estimate of \$85 million for irradiation services. The commentator further suggests that TVA is inflating the taxpayer costs to make the Bellefonte option more attractive.
- 2/01.07 The commentator asks why DOE cannot use off-spec blended-down HEU at Sequoyah for tritium production.
- 3/08.02 The commentator states that every place DOE has made tritium is now a nuclear waste site, and asks why DOE cannot be honest about it.
- 4/24.31 The commentator asks why TVA proposed only 25 years, noting that the Watts Bar Plant came on line in 1986-1987, and should theoretically have 30 years left for tritium production.
- 5/05.31 The commentator complains that there was not enough time to respond to the meeting notice.
- 6/01.04 The commentator states that he is opposed to the use of CLWRs for tritium production since, regardless of which option is chosen, the nonproliferation issue remains.
- 7/01.15 The commentator warns Vice President Gore about the damage his support for the proposed action will do to his presidential campaign in 2000.
- 8/23.05 The commentator states that the Bellefonte option is a risk to ratepayers because of the danger of cost overruns. The commentator warns that ratepayers will "foot the bill" if Bellefonte cannot be completed for under \$2 billion, and the commentator believes it cannot be done.
- 9/05.05 The commentator states that TVA should submit to the record its three scenarios for Bellefonte from its completion plan.
- 10/07.03 The commentator states that only those persons in Alabama who will benefit directly from completion of Bellefonte support this option; a silent majority oppose it.
- 11/02.01 The commentator states that DOE should not commit to using Bellefonte while arms reduction efforts are moving ahead.

**Commentor 804 (Cheryll Dyer)**

- 1/05.27 The commentator asks if TVA is overseen by the state and OSHA regulations, and would this oversight cease if TVA partners with DOE to produce tritium.

**Commentor 805 (Ralph Galt)**

- 1/01.04 The commentor asks whether it is true that the United States promoted the Nonproliferation Treaty to encourage the world's weapons states to stop production and reduce their stockpiles and to persuade nonweapons states to not make nuclear weapons. The commentor asks whether the U.S. Government is violating the Nonproliferation Treaty by making new nuclear weapons. The commentor asks whether the United States is working towards further reductions or maintaining the high level of the stockpile. The commentor asks whether the United States is required to wait for the Russians to ratify the START II treaty before making the agreed-upon reductions. Does the United States have to wait for the international community to agree to arms reduction before it can reduce its nuclear weapons stockpiles. The commentor asks whether U.S. law takes precedence over the Nonproliferation Treaty.

**Commentor 806 (Mike Womacks)**

- 1/23.25 The commentor asks how TVA can reduce its estimated costs for completing the Bellefonte Plant for tritium production. The commentor asks whether ratepayers would have to pay more to make up the \$.5 billion difference.
- 2/23.07 The commentor asks whether residents of Scottsboro, Alabama, would see their rates go up or down as a result of tritium production at Bellefonte.
- 3/13.05 The commentor states that citizens of Jackson County will not receive the benefit of either short- or long-term jobs.
- 4/01.02 The commentor states that congressional support is not universal, and the majority of local citizens are not in favor of using Bellefonte for tritium production.
- 5/23.22 The commentor asks why TVA did not include the negative EIS comments in their latest offer letter to DOE.
- 6/13.06 The commentor states that, if Bellefonte is used, local property values will go down and taxes will go up and that the local school system cannot support the extra students.
- 7/07.06 The commentor states that he supports Bellefonte being converted to a natural gas facility.
- 8/02.01 The commentor states that the United States has enough nuclear bombs, so it is not necessary to make more tritium.
- 9/07.07 The commentor suggests that if it is necessary to make tritium, DOE use an existing facility rather than contaminate a new area.

**Commentor 807 (Linda Ewald)**

- 1/01.13 The commentor asks what is special nuclear material, and why tritium is not a special nuclear material.

**Commentor 808 (Ernie Chaput)**

- 1/05.29 The commentor asks if the Secretary would make the technology decision before the final tritium production EISs (CLWR and APT) are completed.

- 2/05.32 The commentor asks how DOE can make a technology decision when the EIS has not been completed and questions on the safety analysis and environmental impacts in the CLWR Draft EIS have not been addressed. The commentor asks whether the Secretary could change his decision after the final EISs (CLWR and APT) are published. The commentor suggests that DOE is ahead of the NEPA process in making the technology decision before the safety issues are identified and publicly addressed in the final CLWR and APT EISs.
- 3/03.04 The commentor, citing the 2.5 kilogram requirement, says that the CLWR Draft EIS isn't clear as to how many reactors would be needed. The commentor asks whether the Bellefonte option refers to Bellefonte only, or to Bellefonte and another reactor, and would two reactors be used for tritium production in all cases. The commentor asks where in the CLWR Draft EIS does it mention a 12-month cycle for tritium production at Bellefonte? The commentor asks whether DOE submitted materials to the NRC for review and whether the NRC is reviewing the 12-month cycle option.
- 4/24.31 The commentor asks why TVA's irradiation services proposal is for 25 years when the original programmatic proposal was for 40 years. The commentor also asks whether the requirements had changed.

**Commentor 809 (Gary Drinkard)**

- 1/23.23 The commentor asks whether residents of Rhea County would receive a tax break for the risks associated with tritium production at Watts Bar and Sequoyah.
- 2/05.31 The commentor notes that the meeting was called hastily, suggesting that DOE prefers the Watts Bar and Sequoyah option and speculating whether DOE was tipping its hand.
- 3/05.29 The commentor asks why "input from area residents" was not included in the decision criteria shown in the presentation.

**Commentor 810 (Fred Boggess)**

- 1/21.08 The commentor asks whether the license to finish the Bellefonte unit is still in effect.
- 2/23.26 The commentor also asks whether TVA has begun paying back the principal on the debt.
- 3/23.27 The commentor asks whether DOE has determined which reactor method is the most economical way to produce tritium over the 25- or 30-year production period.

**Commentor 811 (Ann Harris)**

- 1/01.06 The commentor asks why DOE has not made it clear that the IAEA does not do any kind of evaluations – they accept the word of the U.S. reactors.
- 2/19.14 The commentor asks who is going to fabricate the tritium rods that DOE would use in the Watts Bar reactor. The commentor asks whether DOE will examine the fabricator's past performance specifically with regards to cladding. The commentor notes there is massive decay of the cladding in the rods that would cut down on the production of Watts Bar, and suggests that DOE would derate the plant even more. The commentor also asks whether one-cycle use would cut power production at Watts Bar.

- 3/24.25 The commentor notes that both EPA and the Occupational, Safety, and Health Administration say they have Memorandums of Understanding with TVA that allow an exchange of paperwork instead of onsite inspections. The commentor asks where he can obtain copies of these Memorandums of Understanding.
- 4/01.14 The commentor asks DOE to consider buying the 14 kilograms of tritium available from a Canadian source.
- 5/14.04 The commentor expresses concern that tritiated water is readily absorbed by the human body and by metal. The commentor is concerned that using Watts Bar for tritium production will turn it into a superfund site, since the Watts Bar Plant metal structures will absorb the tritium.
- 6/14.25 The commentor quotes statistics on the dangers of tritium and calls it “nuclear thalidomide.”
- 7/09.10 The commentor expresses concern about the safety of the primary coolant system at the Sequoyah and Watts Bar Plants, saying the systems are badly designed and are virtually inoperable at any given time.
- 8/01.15 The commentor warns Vice President Gore about the damage his support for the proposed action will do to his presidential campaign in 2000.

**Commentor 812 (Jackie Kittrell)**

- 1/05.26 The commentor asks what steps will occur once the Secretary makes his technology decision at the end of the month, and will there be opportunities for public input during this process.
- 2/21.07 The commentor asks what would be the NRC time line for licensing once a decision has been made to use Watts Bar for tritium production.

**Commentor 813 (Jimmy Wilkey, Rhea County Executive)**

- 1/24.27 The commentor asks if TVA was the only organization to offer a bid in response to DOE’s Request for Proposals for CLWR tritium production.
- 2/13.07 The commentor asks whether the economic impact of using Watts Bar or Sequoyah for tritium production would be positive or negative. The commentor also asks that the welfare of the citizens of Rhea County be included in DOE’s deliberations and notes that Bellefonte would have greater and more positive economic impact.

**Commentor 814 (Ronald Forster)**

- 1/24.26 The commentor asks whether tritium production would shorten the life span of the Watts Bar or Sequoyah units.
- 2/07.08 The commentor states that he favors the completion of the Bellefonte Plant for tritium production because it would produce additional electricity, provide economic benefits to the region, and enable a payback of taxpayer dollars. The commentor states that he is opposed to tritium production at Watts Bar and Sequoyah because it could reduce plant operating lifetimes and would offer no real economic benefits.

**Commentor 815 (H. M. Fagan)**

- 1/24.27 The commentor asks how many organizations are qualified to do this job that didn't want it. The commentor asks why TVA bid on DOE tritium production. The commentor asks why TVA had no competition.
- 2/06.03 The commentor asks whether this is a case of two government agencies (DOE and TVA) "scratching each other's back" to produce tritium. The commentor asks whether the Savannah River Site and some other utilities were considered as potential sites.
- 3/09.03 The commentor notes that TVA is expanding its responsibilities from power production to weapons production, and asks whether tritium production would influence TVA to move further into weapons and defense-related activities.
- 4/14.04 The commentor asks how tritium production would affect TVA's ability to maintain current levels of public health risk around its reactors. The commentor asks whether tritium production is going to increase the amount of radiation leakage and risk to the public from dangerous materials at Watts Bar.

**Commentor 816 (Carol Womacks)**

- 1/24.28 The commentor asks when the last environmental impact study was done using Bellefonte as a nuclear reactor without tritium production.
- 2/23.12 The commentor asks how the \$2.9 billion will be dispersed if tritium production takes place at the Watts Bar Plant.

**Commentor 817 (Chris Lugo)**

- 1/05.21 The commentor asks whether the public has the right to say no if DOE chooses the Watts Bar and Sequoyah Plants for tritium production, and, if so, how is this done. The commentor also asks what their legal recourse would be.
- 2/01.09 The commentor asks whether tritium production in a CLWR would violate the Atomic Energy Act, and who decided it would be acceptable to produce tritium in a CLWR.
- 3/02.01: The commentor states that tritium production is about death and bombs and that the whole cycle of consequences resulting from the use of nuclear weapons should be considered in making a decision about tritium production. The commentor states that he is opposed to tritium production in general.

**Commentor 818 (Patty Fagan)**

- 1/08.03 The commentor asks where tritium has been produced before, and requests a list of these places.
- 2/14.04 The commentor asks how safe is tritium. The commentor expresses belief that TVA had made fishing in local waters impossible, and is concerned about the effects of tritium production on regional air and water.

**Commentor 819 (Don Clark)**

- 1/08.04 The commentor notes past tritium leaks at Brookhaven National Laboratory, and asks why the tritium was allowed to get into the groundwater. The commentor also asks why the tritium leaks were not discovered at Brookhaven National Laboratory for 20 years; what are DOE and Brookhaven National Laboratory doing about the leaks, and what can they do about it.

The commentor submits the following documents along with his written statement:

“Nuclear Regulatory Commission Public Hearing, Testimony of Donald B. Clark,” Sweetwater, Tennessee, August 7, 1997.

“U.S. Department of Energy CLWR Environmental Impact Statement Public Meeting, Testimony of Donald B. Clark,” Evensville, Tennessee, February 26, 1998.

Ferguson, Charles, and Frank Von Hippel, “U.S. Tritium Production Plan Lacks Strategic Rationale,” *Defense News* 29 (December 7-13, 1998).

“Nation Shirks Duty to Nuclear Victims,” *The Tennessean*, September 29, 1998.

**Commentor 820 (Roy Priest for U.S. Congressman Bud Cramer)**

- 1/07.08 The commentor states that Congressman Cramer supports the Bellefonte option on the grounds that it is more cost-effective, offers economic benefits such as cost recovery over the lifetime of the contract, and is very much supported by state and local officials and area residents. The Watts Bar and Sequoyah irradiation services option would offer none of these benefits.

**Commentor 821 (Charles Dotson)**

- 1/07.03 The commentor states that the Bellefonte option is the cheapest and most effective choice over the long term, and it would create jobs and help the economy.

**Commentor 822 (Calvin Underwood)**

- 1/07.08: The commentor states that he supports the Bellefonte option because of the positive impacts it would have on ratepayers, taxpayers, and the area workforce. Only this option would increase jobs. The Bellefonte option is the only option fully compatible with the programmatic requirements. Bellefonte offers a dedicated facility with a flexible schedule that can adapt to programmatic changes in requirements. It would be difficult to deal with such changes at a nondedicated baseload plant like Watts Bar or Sequoyah. Also, cost factors favor Bellefonte—it would be the best option for DOE, TVA, the United States, and TVA ratepayers.

**Commentor 823 (Steve Tanner)**

- 1/07.08 The commentor notes that DOE has stated the selection criteria being considered. One criteria not listed, which is stated in public law, involves the “liabilities and benefits of the technologies, including benefits like revenues.” They (the commentor’s family) believe TVA’s Watts Bar and Sequoyah option would not be the best choice for tritium production for three reasons.

First, the offer commits two baseload nuclear plants to a mission that would no longer be solely power production. This would place a liability on TVA and would increase risks to TVA's ability to produce reliable, low-cost power for its customers, the ratepayers.

Second, there are no direct benefits from the Watts Bar/Sequoyah offer to Hamilton or Rhea Counties or the State of Tennessee. The offer provides no new jobs and no increase in the tax base. It does not salvage use of an existing government asset; provides no revenue-sharing to DOE; and does not add the positive environmental benefit of new power generation without emission of greenhouse gases.

Third, the overall cost is higher than that of the Bellefonte option. Although the Watts Bar offer comes with low annual payments, the total long-term cost is higher than the Bellefonte offer and the term is shorter.

The commentors, therefore, believe that Bellefonte would be the best choice for tritium production because it meets the selection criteria; offers the lowest cost to taxpayers; does not come with the liabilities and risks of a baseload plant; and provides distinct local and national economic benefits.

The commentors point out that DOE must not forget that it has other missions in addition to national security. DOE's core mission statement begins with the words, "To foster a secure and reliable energy system that is environmentally sustainable,...." During the Fiscal Year 1999 budget process, DOE states that it had established five key goals that drive all its strategic planning and budgetary decisions. Three of these goals are directly supported by the selection of Bellefonte, but are not supported by the selection of Watts Bar and Sequoyah.

Selection of Bellefonte would:

- Promote clean, efficient energy and enhance energy security through provision of new nuclear power generation capacity.
- Stabilize and protect the environment by preventing new fossil-fueled generation that would result in greenhouse gas emissions.
- Stimulate U.S. economic productivity through job creation and multiregional economic development.

The commentors contend that the Secretary of Energy should not select merely an acceptable option, but should select the option that, using the Vice President's words, is in the "best interest of all citizens."

#### **Commentor 824 (Joseph Imhof)**

1/01.09 The commentor states that he opposes the use of commercial facilities for weapons use.

2/ 07.08 The commentor believes the best policy is one that entails the least amount of harm to the fewest humans and biological entities. Therefore, the impact of tritium production should be minimal. The commentor believes existing facilities should be used for tritium production whenever possible without impacting new areas of population and generating additional expense to U.S. taxpayers. Use of existing facilities would avoid creating new health risks and environmental concerns. The commentor believes Watts Bar should be the main unit for tritium production, with Sequoyah as a backup facility. Bellefonte should be considered for use as a natural gas electric power production

facility, which would cost billions less than its completion as a nuclear power plant. Bellefonte should not be considered for use as a coal-fired plant because this would make it a source of acid rain and particulate matter, which would aggravate people with respiratory illnesses.

**Commentor 825 (Ralph Hutchison)**

- 1/01.01 The commentor is in favor of arms reduction and eventual nuclear disarmament.
- 2/14.05 The commentor states that, according to the CLWR Draft EIS, tritium production at Watts Bar under normal operations would increase tritium released to the air by slightly less than 300 times. Tritium released to area water sources without tritium production at Watts Bar is 639 Curies compared to 17,649 Curies from tritium production. In addition, radiation doses to area residents is 10 times higher than normal under tritium production.
- 3/02.01 The commentor submits a letter to the Secretary from himself and other area residents asking DOE not to produce tritium at any of the TVA plant sites or at the Savannah River Site.

**Commentor 826 (Jimmy Sandlin)**

- 1/07.08 The commentor states that the people of Jackson County, Alabama, support tritium production at Bellefonte and are opposed to tritium production at the Watts Bar/Sequoyah Plants because it would compromise the region's power supply under moderate and extreme loading conditions. Tritium production at Bellefonte would add 1,200 megawatts to the TVA power system, which would decrease the risk of sharp price increases and increase stability. Selection of the Watts Bar/Sequoyah Plants would increase price instability because the generation capacity supplied by the plants could be interrupted if DOE needs to extract tritium during extreme load conditions. If TVA nuclear generation were not available, wholesale power costs would rise, thereby jeopardizing municipal and cooperative electric distribution systems. The commentor states that the Tennessee Valley Power Distributors unanimously support completion of Bellefonte for tritium production.

**Commentor 827 (Louvain Edmondson)**

- 1/07.03 The commentor states that Bellefonte is the best choice for tritium production because there is substantial congressional, state, and local support. Also, a dedicated unit is preferable to a baseload plant that would lose power generation if put on a 12-month schedule, resulting in negative impacts to ratepayers. Bellefonte would provide additional generation capacity without greenhouse gas emissions, as well as economic benefits such as jobs and cost recovery via revenues.

**Commentor 828 (Monica Blanton)**

- 1/01.09 The commentor states that the United States should follow the nonproliferation policy it espouses to other nations by not using commercial facilities for weapons production. The commentor states that the proposed action blurs the line between civilian and military nuclear facilities.
- 2/23.13 The commentor states that the cost to produce tritium should not be a major factor in determining where it is produced.
- 3/07.04 The commentor opposes tritium production at any of the TVA plants.



**Commentor 829 (Mary Lentsch)**

- 1/02.01 The commentor states that tritium production is unnecessary because reserve inventories are available and can last until 2016. The commentor states that she trusts Secretary of Energy Bill Richardson to say “NO” to tritium production.
- 2/01.09 The commentor states that the United States must maintain its respect among nations by following the nonproliferation policies it has promoted, particularly the ban on the use of commercial facilities for military nuclear purposes.
- 3/01.04 The commentor states that the United States cannot maintain its integrity if it violates the Nonproliferation Treaty to produce tritium. The commentor states that interdependence among nations in living up to their agreements is vital.
- 4/01.12 The commentor does not understand why there is such urgency for tritium production at the Watts Bar/Sequoyah Plants when the United States seems to be reducing its nuclear arsenal.
- 5/07.07 The commentor states that, if tritium is produced at the Watts Bar/Sequoyah Plants, all she can say is “MERCY ME! OH LORD, HAVE MERCY!”

**Commentor 830 (Dwight Wilhoit)**

- 1/07.08 The commentor asks that the Secretary not do the cheap and easy thing in making his decision, but do the right thing—select Bellefonte for tritium production. Selection of Bellefonte is supported by local residents and would help a depressed area by bringing thousands of jobs, while selection of Watts Bar does nothing for the citizens of the Tennessee Valley.

**Commentor 831 (Don Nelms)**

- 1/07.03 The commentor states that he and his union support the use of the Bellefonte Plant for tritium production. The commentor states that TVA was founded to provide jobs and electricity for Americans, and DOE has the opportunity to help TVA continue to do so.

**Commentor 832 (Carl Fowler)**

- 1/06.03 The commentor states that he opposes the use of Hanford (Fast Flux Test Facility) for tritium production for cost and environmental reasons.
- 2/07.01 The commentor opposes building the APT for tritium production for economic and schedule reasons, and states it is an unproven technology.
- 3/07.08 The commentor opposes using Watts Bar and/or Sequoyah for tritium production because it would not yield any economic benefit and the option has little support among area residents. The commentor points out that tritium production would be secondary at Watts Bar and Sequoyah, but the primary mission at Bellefonte. The commentor supports the completion and use of Bellefonte for tritium production because it would bring substantial economic benefit to the region and there is significant local, state, and congressional support for this option.

**Commentor 833 (Greg Wright)**

- 1/07.08 The commentor, as a businessman, recognizes that there is little return on DOE's investment if it uses the Watts Bar and Sequoyah plants for tritium production, but there would be a high return from selecting the Bellefonte plant for this purpose. Bellefonte would be an asset to the economy in the southern region of the country; would increase TVA's electricity-generating capacity; and would stabilize rates.

**Commentor 834 (Mitchell Weir)**

- 1/07.08 The commentor is against the selection of the Watts Bar and Sequoyah plants and favors selection of the Bellefonte plant on the basis of job creation.

**Commentor 835 (Leaf Myczack)**

- 1/05.31 The commentor complains that notification about the meeting was poor.
- 2/05.09 The commentor charges that the Lead Test Assembly demonstration was already underway when DOE had the public meeting on that issue.
- 3/24.29 The commentor states that tritium is a weapons component and DOE should be honest about that fact.
- 4/24.30 The commentor expresses concern about the impacts of tritium production on uranium mine workers and people living in the vicinity of uranium mines.
- 5/07.04 The commentor opposes tritium production at any of the TVA plants.

## TABLE OF CONTENTS

	<i>Page</i>
2. COMMENT DOCUMENTS .....	2-1

## List of Figures